

G. RESPONSES TO COMMENTS FROM SUZANNE ELLEDGE PLANNING AND PERMITTING SERVICES, INC. (REPRESENTING SBCH)

- G-1 **Mitigation Timing.** The mitigation measures from the EIR that are applied by the decision-makers will become conditions of permit approval. Prior to Planning Commission consideration, City Staff will propose conditions of approval for the project, which will include mitigation measures with refined timing. The applicant needs to identify specific concerns with the timing of specific measures. The conditions of approval will be reviewed and considered by the Planning Commission and public during project consideration.
- G-2 **Mitigation Measures for Specific Plan Build Out.** The commentator's opinion is noted and will be forwarded for decision-maker consideration. The project proposal includes establishment of the Specific Plan, which would supersede the present zoning designation and Conditional Use Permit process for the site. The decision-makers are charged with a discretionary decision as to whether to approve the Specific Plan. The EIR environmental impact analysis of the Specific Plan proposal uses a reasonable worst-case assumption of potential future development on the site beyond that in the current development proposal. There is limited additional physical space for structural expansion, and the assumption identifies a limited amount of potential future development. The assumption for additional future development is based on plans provided by the applicant at the time of commencement of environmental review and thus is not speculative. As is provided under CEQA, the EIR analysis for the Specific Plan is more general than for the current development project, but must identify potential environmental effects and feasible mitigation measures, which will provide a basis for decision-maker CEQA findings on an action to approve or deny the Specific Plan. Each identified mitigation measure could either be identified as a Development Standard within the Specific Plan, and/or could be applied as a condition of approval of the Specific Plan, and/or applied as a condition of a future development project approval. At the time a future project is considered, the CEQA analysis in this EIR, including mitigation measures, would be reviewed and as appropriate, based on any changes in the project or environmental circumstances, determined adequate or refined or augmented.
- G-3 The referenced sentence is corrected in the Final EIR to state: *Noise generated by rooftop HVAC equipment would also be reduced by 8 dBA from the rooftop.*
- G-4 **Project Features and Mitigation: Utilities.** The EIR identifies Project Features already proposed by the applicant and incorporated into the project description that serve to mitigate potential environmental effects. Mitigation measures are additional project design changes, operational measures, or construction practices identified in the EIR to further reduce environmental effects. The EIR analysis states that, with implementation of Project Feature PF 12-7, Undergrounding of Utilities, impacts associated with utility lines would be less than significant. The comment is correct that no further mitigation measures are identified as required for long-term or construction impacts associated with utilities.

- G-5 **Neighborhood Traffic Management Plan.** The commentator's point is correct that the discussion in the Executive Summary (page 1-84) regarding neighborhood traffic/circulation mitigation was in error due to inadvertent insertion of the wrong text. Chapter 1.0, the Executive Summary, is corrected as part of the Final EIR. As discussed in the EIR Transportation chapter, the correct discussion is that the addition of cumulative traffic, project traffic, and diverted trips would have an adverse but not significant impact on neighborhood traffic and circulation and the livability of the residential uses and park uses within one block of the project site. The improvements specified under the mitigation for the closure of Castillo Street would also be effective mitigation for the increase in neighborhood traffic, maintenance of appropriate vehicle speeds, promotion of pedestrian safety, and maintaining the livability of the neighborhood.
- G-6 **Project Features and Mitigation: Lighting.** Please see Response to Comment G-4. Chapter 1.0, Executive Summary, identifies both Project Features and applicable mitigation measures that serve to reduce potential environmental impacts. The EIR analysis of interior lighting impacts as less than significant recognizes that implementation of PF 14-1 and PF 14-5 providing for project design and operation measures for closing of window coverings at night would reduce potential interior lighting effects to the neighborhood to adverse but less than significant levels.
- G-7 The comment states that the following information contained on page 3-3 of the DEIR needs clarification in terms of the description of the building code applicable to the proposed project:

Office of Statewide Hospital Planning and Development Requirements

The Office of Statewide Health Planning and Development (OSHDP) is a department of the California Health and Human Services Agency. Licensed acute care hospital construction in California is regulated and permitted by the Facilities Development Division (FDD) of OSHDP in accordance with Title 22 of the California Building Code (CBC) and Title 24 of the California Administrative Code (CAC).

The City concurs with the comment and therefore has revised the text, now presented in the FEIR as follows:

The project is governed by the California Building Standards Code (CBSC), which is also known as California Code of Regulations (CCR), Title 24. The CBSC has 11 parts. Part 2 is the 2001 California Building Code. The proposed project is governed by all parts of the CBSC.

- G-8 **Project Description.** The comment states that the second-to-last paragraph on page 3-4 should be corrected regarding which hospital buildings will be converted to non-acute care uses. The comment states that hospital facilities A (West Wing), B (Central Wing), C (Reeves Wing), F (North Wing), J (Eye Center), and L (Central Services Building) will be demolished, and that Buildings I (Centennial Wing, including the Emergency Department), and G (Surgery Wing) will be able to remain acute care facilities indefinitely, as they comply with SB 1953 structural requirements. The comment also states that facilities D (South

Wing), E (East Wing), H (attached to East Wing), and K (Cancer Center) will be converted to non-acute care except for an existing psychiatric in-patient unit on the 5th floor of the East Wing.

The information and project description in the DEIR was obtained from "Santa Barbara Cottage Hospital Seismic Compliance and Modernization Plan Project Description," Suzanne Elledge Planning & Permitting Services (SEPPS), April 2004. That document stated: "Buildout of the project calls for the demolition of approximately 225,800 SF of the existing main SBCH building, leaving only the portion of the building facing Bath Street and a portion of Junipero Street (the existing South Wing, East Wing, Centennial Wing, and Buildings G and K would not be demolished)." The Project Description chapter in the Final EIR has been corrected to reflect the information contained in the comment. The correction to the type of use continued in the existing buildings to remain acute care facilities (Buildings G and I) does not affect the analysis conducted in the EIR for potential environmental impacts.

- G-9 **Project Description: Potential Future Phase.** Please see Response to Comment G-2. The commentator's opinion that the potential future phase is not a reasonably foreseeable project is noted. City Staff disagrees, and the EIR identifies this as a reasonable worst-case assumption for full build out of the Specific Plan. The text correctly identifies this as a *potential Future Reconstruction Phase*, and notes *no plans currently proposed*. In addition to evaluating environmental impacts of the current development proposal as a project-specific EIR, the EIR also evaluates the potential impacts of build out of the entire Specific Plan area with a more general program-level analysis. At the commencement of environmental review, project application materials submitted by the applicant described that a potential future development phase beyond 2011 (fourth nursing pavilion with 100 beds) could be realized by SBCH if there is a need for additional acute care space in Santa Barbara. The indicated contemplation of this future phase provided the basis for City determination of this as a reasonably foreseeable project. Although there are currently no definitive plans for a future phase at this time, such development could be permitted in the future under the proposed Specific Plan. Should current assumptions prove wrong regarding no substantial future increase in demand for hospital services from other hospital closures, population increases, or unforeseen health crises, it would be expected that the hospital would likely pursue such a project to increase the number of beds. Consistent with CEQA requirements for cumulative impacts analysis, this reasonable worst-case assumption and evaluation provides decision-makers and the public with analysis of project impacts at full build out allowable under the Specific Plan approval.

The EIR analysis of the Specific Plan needs to identify both impacts and feasible mitigation. As noted earlier, mitigation measures for the potential future phase could be incorporated as Specific Plan development standards, applied as conditions of Specific Plan approval, or applied as conditions of approval of a future development project. An actual future development proposal would require subsequent environmental review to determine whether the analysis within this EIR, including mitigation, is adequate or needs revision or augmentation. This response applies to all the multiple references to this comment in the applicant's letter.

- G-10 **Tree Counts.** The comment states that the tree counts listed in Table 3-8, Summary of Project Characteristics, should be updated per a revised count provided by the project arborist (attachment to SEPPS letter, memo dated 12/14/04). The updated information is noted. The EIR assumptions for removal, relocation, and replacement of trees constitute a reasonably accurate estimate for purposes of CEQA impact evaluation, and no changes to the EIR analysis are required.
- G-11 **Permitted Land Uses.** The comment states that Table 3.C should be revised to reflect that under the proposed Specific Plan, in all land use areas, “Any use permitted in the C-O, Medical Office zone would also be permitted.” City Staff agrees that allowing Land Use Areas B and C to also permit any use in the C-O zone would be appropriate. However, City Staff will recommend that residential uses not be permitted within Land Use Area A (main hospital facility), as they would be inappropriate. Residential uses within Land Use Areas B and C would be appropriate, since both of these areas abut residential areas. Table 3.C is revised to reflect this.
- G-12 **Bed Occupancy Rate.** The referenced text is clarified to state the following:
- Bed occupancy currently averages 226 beds, which is approximately 50 percent of the 456 licensed beds. With implementation of the project, average bed occupancy is projected to be 226 beds, which is approximately 67 percent of the proposed 337 licensed beds.* This text clarification does not alter the EIR impact analysis.
- G-13 **Architectural Styles.** Regarding the DEIR’s reference to the proposed reconstructed hospital as “Spanish” style, there is a difference of opinion regarding the classification of the hospital’s architectural style. The use of the term “Spanish Colonial Revival” has been used by the project applicant and is often used to describe architecture within the City of Santa Barbara; however, this nomenclature is technically incorrect. According to the City’s Urban Historian, Jake Jacobus, “... The proposed hospital structure is not really Spanish Colonial Revival. It would be better classified as Spanish Eclectic or Mediterranean Revival. In Santa Barbara, we tend to classify all stucco clad buildings with red tile roofs as Spanish Colonial Revival. In many cases, such as this, that is an incorrect term” (memorandum dated August 23, 2004, from Jake Jacobus to Irma Unzueta, Project Planner). For analysis purposes in the EIR, the terms Spanish Colonial Revival or Spanish to describe the project’s architecture are interchangeable and do not alter the conclusions of the EIR.
- G-14 **Employee Counts.** The commentator’s request to revise all calculations and analysis of SBCH employees counts based on subsequent FTE numbers is noted. City Staff disagrees with this request. Employee numbers may fluctuate over time. While the hospital currently expects the employees to remain indefinitely in Goleta, there is no proposal to establish this as a permanent certainty through the permit process, and the hospital could change this determination at a later time (i.e., move the employees back to SBCH). The FTE numbers used by the EIR represent a reasonable worst-case assumption. Therefore, the calculations and analysis of SBCH employee counts will not be revised.
- G-15 **MRI Trailer and Loading Dock Locations.** This updated information is noted. The DEIR utilized the project description information submitted by the applicant and available at the

- time DEIR preparation commenced. These are temporary locations for the MRI trailer and loading dock and would not result in changes to the environmental impact analysis identified in the EIR.
- G-16 **Parking Space Inventory.** The proposed surface parking spaces were inadvertently left out of the project's parking supply in the Traffic Impact Analysis and Chapter 13 of the Draft EIR. The project's parking demand of 1,359 spaces was compared to a supply of 1,311 parking spaces (1,191 structure parking spaces plus 120 on-street parking spaces). The technical report and the EIR chapter have been revised to include the additional 61 surface parking spaces that would be provided with the project. When the additional 61 surface parking spaces are added to the previously assumed supply of 1,311 spaces, the project's parking supply would be 1,372 spaces. As a result of this change, adequate parking will be provided to accommodate the forecast demand of 1,359 spaces. With this correction, Mitigation Measure TRF-4 would not be required and therefore has been removed from the EIR.
- G-17 **Construction Phasing.** The comment is noted that project construction phasing as described in the DEIR is approximate and may be adjusted during construction. It is expected that the City will place conditions of approval on project construction, tailored by phase. The construction period mitigation measures contained in the Final EIR will be monitored by the City, State (OSHDP), and other regulatory agencies as appropriate. Any adjustments to the construction phasing will require City determination of substantial conformance with conditions, and/or OSHDP approval.
- G-18 **Helicopter Flight Paths.** The flight paths depicted on Figure 3.5, Helicopter Flight Paths, are approximate for normal and windy conditions (ref. October 2003 report by Acoustical Analysis Associates, Inc.). The purpose of the graphic is to depict the likely flight path locations relative to the project site and surrounding neighborhood. Should abnormal weather or other conditions occur during helicopter flights to and from SBCH, the pilot would have the discretion to fly an alternative path as appropriate.
- G-19 **Helipad Lighting Plan.** The changes discussed in the comment regarding the proposed Helipad Lighting Plan are noted. The DEIR utilized project description information that was available from the applicant at the time environmental review commenced. The identified modifications to the helicopter lighting plan represent minor refinements to the number, color, and location of several of the lighting fixtures. There would not be a substantial increase in the number or severity of lighting effects due to these changes. No change is required to the Chapter 14.0 analysis of night lighting impacts from the proposed helipad and helicopter flight operations or impact significance conclusions in the EIR.
- G-20 **Economic Development Plan.** The CEQA Guidelines provide for inclusion of an initial consistency analysis with applicable general plans and regional plans and policies adopted for the purpose of avoiding or mitigating environmental impacts. The City's Economic Development Plan is outside the scope of an EIR. The Staff Report on the project will include discussion of the City Economic Development Plan. The comment is forwarded for decision-maker consideration.

- G-21 **Permitted Land Uses.** Please refer to Response to Comment G-11 regarding permitted uses in all land use areas of the Specific Plan.
- G-22 **Air Quality Analysis.** The commentator's opinion is noted. Please see Responses to Comments G-88 through G-101 regarding comments on Traffic and Circulation and analytic assumptions for existing and future scenarios. The air quality analysis identifies the estimated increase in mobile source air emissions using reasonable worst-case assumptions. No revision to the air quality analysis is required.

- G-23 **Green Building.** Project Feature PF 5-1 Green Building is revised to read as follows:

"Green building" refers to incorporation of building design and construction techniques that minimize energy use, conserve water, and reduce solid waste and hazardous substances. The project would implement a sufficient number of features from the Leadership in Energy and Environmental Design (LEED) Green Building Rating System to achieve LEED certification to lessen energy use, water use, solid waste generation, and hazardous materials, as feasible. Chapter 12.0, Public Services, contains Mitigation Measure PS-4, which recommends a LEED's certification for the proposed project.

The EIR analysis of impacts associated with increased energy use has been clarified to identify the impact as adverse but not significant. Mitigation Measure PS-4 (LEED certification) is identified as a recommended mitigation measure. This measure would also provide mitigation for air quality effects.

- G-24 **Potential Future Development.** Comment is noted. Please refer to Responses to Comments G-2 and G-9. Requested approval of a Specific Plan for the site requires evaluation of impacts and mitigation associated with full build out permissible under the Specific Plan. A future development proposal would be subject to additional CEQA review, unless it is determined to be adequately covered under this current EIR.
- G-25 **Energy Code Requirements and Design Features.** California Code minimum requirements do not preclude an EIR from identifying mitigation measures that go beyond minimum state codes. The EIR identifies significant air quality effects of the project. The EIR acknowledges that the proposed project is incorporating energy-saving features (ref. PF 5-1, page 5-13). To reduce air quality effects of the project, Mitigation Measure AQ-1 provides that specified energy conservation measures be incorporated into the project design, unless demonstrated to be infeasible.
- G-26 **APCD Operating Permits.** Mitigation Measure AQ-2 is clarified as follows to indicate that Air District permits for equipment are required prior to occupancy permits for applicable structures:
- AQ-2 Stationary Source Permits.** Required operational permits for stationary emission sources, including boilers and sterilizers, shall be obtained by the applicant from SBCAPCD prior to occupancy permit issuance for the Central Plant or other applicable structures.*

- G-27 **Specific Plan and Mission Creek.** The Specific Plan impacts to Mission Creek would be the same as those identified for the proposed project, since the replacement hospital is part of the overall development authorized by the Specific Plan. As described in Section 6.7.1, modification of the proposed outlet structure at Mission Creek would have the potential to alter the existing drainage, would require permits from the Corps of Engineers and California Department of Fish and Game, and could be potentially significant. Upon compliance with PF 10-4 and PF 10-5 and Mitigation Measures B-14 through B-16, HYD-8, HYD-9, HYD-11, and HYD-13, potential effects to Mission Creek associated with the proposed reconstruction of the storm drain outlet structure are reduced to a less than significant level. The text provided in this response clarifies the discussion on page 6-24 of the EIR. No revisions to the EIR conclusions are required.

As described in Response to Comment G-58, PF 10-5 has been modified to delete the installation of an energy dissipater. As described in Response to Comment G-58, removal of the dissipater from the project design does not alter the conclusions of the hydrology analysis or findings of the EIR. References to the energy dissipater in Chapter 6.0 have been deleted.

- G-28 **Arborist Monitoring and Reporting.** As part of the Mitigation Monitoring Report Program (MMRP), a qualified representative of the developer, approved by the City Planning Division, would be responsible for assuring full compliance with the provisions of the mitigations. This representative is referred to as the Project Environmental Coordinator (PEC) and will have authority over all other monitors/specialists, the contractor, and all construction personnel for those actions that relate to mitigation monitoring. As already noted in the measure, it is correct that the applicant would hire the Arborist; however, oversight of the monitoring and reporting requirements specified in the MMRP would be the responsibility of the PEC. Mitigation Measures B-1 and B-2 have been refined in terms of the Arborist's monitoring role and reporting requirements as part of the Conditions of Approval for the project.
- G-29 **Timing for Replacement Landscaping.** The EIR identifies that replacement landscaping would be installed by the completion of each phase. As concluded in the EIR, replacement of vegetation, including trees after completion of each phase of construction, would assist in minimizing the temporal loss of roosting, nesting, and foraging habitat for localized wildlife species. Mitigation Measure B-3, which requires replanting of grasses, ground covers, shrubs, and trees in a sequential manner, is intended to provide opportunities for birds and animals to be recolonizing the new vegetation on site.
- G-30 **Moreton Bay Fig Appraisal and Compensation Mitigation.** Loss of the Moreton Bay fig tree after implementation of the maintenance measures identified in the EIR would be a potentially significant impact of the proposed project, due to its eligibility as a Tree of Merit and its biological and aesthetic value as a substantial tree resource. Section 15126.4(a)(1)(A) of the CEQA Guidelines states that "... The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the

EIR.” As there is the potential for loss of the Moreton Bay fig tree as a result of project implementation, and this loss is considered a potentially significant impact, the EIR identified feasible mitigation measures to minimize these impacts.

Payment of compensation for the loss of the tree is permissible under CEQA as long as there is an essential nexus between the mitigation measure and a legitimate governmental interest and the mitigation is roughly proportional to the impacts of the project (Section 15126.4(a)(4) of the CEQA Guidelines). As cited in Section 15126.4(a)(4)(b), “... Where the mitigation measure is an ad hoc exaction, it must be ‘roughly proportional’ to the impacts of the project.” Given that the loss of the Moreton Bay fig tree would result in the permanent loss of an important community resource, mitigation through payment of compensation in the form of the assessed value of the tree would be “roughly proportional” to the effect being mitigated (i.e., loss of the Moreton Bay fig tree), consistent with the requirements set forth in Section 15126.4(a)(4). While Mitigation Measure B-6 would provide for applicant planting of a replacement tree, it would be many years before the replacement tree would provide the biomass and visual aesthetics and value of the tree lost. The additional compensation would provide for planting of additional specimen trees within the area, which would partially mitigate the impact.

Mitigation Measure B-7 has been amended to add the following: *The compensation payment shall be applied toward planting specimen trees within the Oak Park Neighborhood pursuant to the City's Master Street Tree Plan implemented by the Forestry Section of the Parks and Recreation Department.*

G-31 Moreton Bay Fig Tree Replacement Mitigation. The Moreton Bay Fig tree located on the project site has been identified as an important and significant biological resource. The Arborist Report prepared for the project identifies this tree as a significant tree resource. The Historic Structures Report for the project also recognizes this tree as eligible for a City object of merit designation. The EIR analysis identifies the potential loss of this tree due to construction of the new hospital or lack of proper maintenance as a significant biological resource impact. Based on the applicant's Arborist Report and LSA's visual field observations, the tree is showing signs of stress due to the relatively small planting space where it is currently located and the lack of sufficient water. The construction of new structures adjacent to the tree has the potential to result in long-term damage to the health of this significant tree. The EIR concludes that proper maintenance and care of the tree would enhance the survival of this tree. The intent is to properly maintain and enhance the survivability of the Moreton Bay Fig tree, however in the event that the tree does not survive, Mitigation Measure B-6 requires that it be replaced with the largest available specimen of the same species. The Replacement Plan would be required to ensure that proper planting and maintenance procedures are undertaken.

G-32 Vegetation Removal Mitigation. Given the mature nature of the vegetation within the project area, there is the potential for nesting birds to be encountered during construction activities. As discussed in the EIR, Mitigation Measure B-8 provides for vegetation removal to occur outside of bird nesting season as feasible, or alternatively to provide for survey and buffer to protect any nesting birds. This measure is identified to mitigate potential construction impacts to nesting birds to a less than significant level. Mitigation Measure B-8

has been refined to provide that the project biologist may determine appropriate buffer distances depending on the biological circumstances and species involved.

B-8 Nesting Season. *Prior to issuance of any demolition, grading, or building permit, the applicant shall provide evidence that the contractor specifications include a requirement to remove vegetation outside the breeding/nesting season (January 15 through August), if feasible. If removal of vegetation during the breeding season is required due to construction or phasing logistics, documentation of these conditions, and their effect on vegetation removal, shall be provided to the Community Development Department. The language shall be submitted to and approved by the Community Development Department. The language shall include a requirement for the following: 1) if vegetation removal must occur during the breeding season, pre-construction surveys shall be conducted by a qualified biologist in the appropriate habitats within, and up to, 100 feet from the proposed vegetation removal area to identify nesting birds within or adjacent to the removal area, 2) if active nests are observed within or adjacent to the vegetation removal area, the Project Biologist shall establish an appropriate buffer between the nest and construction activities until either the young have fledged or the nest becomes inactive, depending on the biological circumstances and species involved.*

- G-33 **Tree Protection and Replacement.** The commentator's opinion is noted. Mitigation Measure B-10 provides for protection during the construction process for existing trees proposed by the applicant to remain and replacement of any such trees lost during the construction process. The replacement ratio for new trees planted as part of the new project landscaping that are inadvertently lost would be a 1:1 replacement until successful establishment. For existing trees identified on approved plans to be retained on site but that are removed, relocated, lost, or substantially damaged during construction, the replacement ratio is identified as 10:1, which should serve as a disincentive for construction process tree losses.
- G-34 **Paving Within Tree Driplines.** The text of Mitigation Measure B-11 is not contradictory. The measure emphasizes the minimization of impervious surfaces under native and specimen tree canopies/drip lines; however, it does recognize that it may not be feasible to stay completely outside of the canopies/drip lines. In the event that impermeable surfaces are required, no more than 25 percent of the total area beneath the canopy/drip line shall be covered. The measure does state that no surface, either pervious or impervious, shall be placed within a six-foot radius of oak tree trunks. Placement of pervious and impervious surfaces is permitted, within the requirements identified, under all other tree types.
- G-35 **Oak Tree Replacement.** Native oak trees are a particularly valuable tree resource in Santa Barbara, require a long period to achieve specimen size, and are particularly sensitive and difficult to establish. Higher replacement ratios are necessary to assure successful replacement and to provide replacement of comparable biomass within a reasonable timeframe. In the event that site constraints do not allow on-site location of all replacement trees, trees may be located nearby as street trees or at Oak Park. Mitigation Measure B-12 has been clarified to provide for City maintenance of any off-site replacement trees on City property or right-of-way and to retain applicant responsibility for providing and installing replacement trees as required to achieve successful establishment.

B-12 Coast Live Oak Tree Replacement Plan. Prior to issuance of demolition or grading permits for any phase where existing oak trees would be affected, an Oak Tree Replacement Plan, which identifies on-site and off-site locations for replacement of affected oak trees, shall be prepared by a Certified Arborist or Consulting Arborist for review and approval by the City Arborist. Off-site replacement shall be conducted within one mile of the project site. The following replacement ratios shall be used to determine the number of trees that must be replaced.

Existing Tree Size (dbh)	Mitigation Ratio	Size(s) of Mitigation Trees
5" and less	1:1	One 15-gallon
6–11"	2:1	Two 15-gallon
12–18"	3:1	Two 15-gallon and one 24-inch box
19–24"	5:1	Three 15-gallon and two 24-inch box
25" and up	10:1	Five 15-gallon and five 24-inch box

The Plan shall also identify on-site and off-site locations for replacement trees, tree planting, maintenance and monitoring plans, and specifications. Monitoring of on-site replacement oaks by the Project Arborist shall be required for a minimum of five years after planting, with yearly reports submitted to the Community Development Department and the City Arborist. Trees replaced off-site shall be monitored and maintained by the property owner. Trees planted on City property shall be monitored and maintained by the City Arborist. The City Arborist shall provide a monitoring report to the Community Development Department on an annual basis for a period of five years, documenting the monitoring and maintenance activities undertaken for both on-site and off-site replacement trees, success of these activities and identifying remedial measures, if required. All replacement and mitigation trees, including trees replaced off-site, shall have a 101 percent success rate and shall be healthy, vigorous, and exhibiting recent growth at the end of five years. If initial efforts are unsuccessful, replacement oak trees will be replanted at a 1:1 ratio until a 100 percent success rate is achieved.

G-36 **Historic Structures Report.** The City Master Environmental Review procedures and the City Historic Landmarks Commission (HLC) guidelines, both adopted by the City Council, provide that Historic Structures Reports be submitted by the applicant in accordance with established procedures to obtain acceptance by the HLC. This may be done concurrently during a CEQA environmental review process or separately, but needs to be completed prior to decision-maker consideration of the project permits.

G-37 **Fault Rupture Impacts.** The third sentence of Section 8.6.1 is revised to delete the words “Alquist-Priolo” and “rupture zone.”

G-38 **Corrosive Soil Impacts.** The tests performed for Fugro’s September 2003 report are an indicator that special mitigation measures for corrosion are not expected to be required. However, it is standard practice to confirm the corrosivity of the soils at the completion of grading. Therefore, Mitigation Measure GEO-1 remains an identified measure in the FEIR.

- G-39 **Oversized Rock Impacts.** Issues regarding oversize rock would be handled as part of grading and excavation. Due to the anticipated abundance of oversize materials, contractors should be prepared to handle these materials at the start of the project. Mitigation Measure GEO-2 remains an identified measure in the FEIR.
- G-40 **Corrosive Soil Mitigation.** Please see Response to Comment G-38.
- G-41 **Final Geotechnical Investigations.** GEO-2: The governing regulatory agencies for the proposed structures (Office of Statewide Health Planning and Development [OSHPD] for the hospital structures and the City of Santa Barbara Department of Building and Safety for the other structures) will determine whether and what, if any, additional geotechnical information is needed for each phase of the development. GEO-3: Monitoring during grading and construction, usually referred to as geotechnical observation and testing, is routinely required to ensure that significant impacts are avoided. The regulatory agencies may require that their own inspectors provide some or all of the monitoring for a project. Mitigation Measures GEO-2 and GEO-3 remain identified measures in the FEIR.
- G-42 **Excavation and Site Safety.** The applicant is responsible for implementation of all mitigation measures applied as conditions of approval. Recommendations for the inclination of temporary slopes are made by the applicant's project geotechnical engineer. The project geotechnical engineer also provides parameters for use in the design of shoring. Since the applicant's contractor has control of the site, including the inclination at which temporary slopes are actually cut, site safety is the responsibility of the contractor. Actual design of the shoring and the means and methods of excavation are determined by the contractor. Dewatering systems are also the responsibility of the contractor. Mitigation Measure GEO-4 is revised in the Final EIR and provided below to clarify that the contractor is responsible for construction means and methods and site safety.

GEO-4 Excavation and Shoring Safety. Prior to construction, a qualified geotechnical engineer shall evaluate the site and provide parameters for use in the planning and design of shoring and temporary sloped excavations. During excavation, the geotechnical engineer shall observe the excavation and provided supplementary/revised recommendations as necessary. The geotechnical engineer shall provide monthly reports summarizing site evaluations and any remedial actions taken by SBCH, the City Building and Safety Department, and the Construction Contractor.

Prior to construction, the contractor shall retain a structural engineer to design any shoring that may be required. The shoring design shall be submitted to the geotechnical engineer for review for conformance with the geotechnical engineer's recommendations. The installation of the shoring and any testing required shall be performed by the Construction Contractor under the observation of the geotechnical engineer.

Prior to construction, the contractor shall determine the need for dewatering and, if dewatering is necessary, install and confirm the satisfactory operation of a dewatering system. The contractor shall survey the adjacent streets prior to and during dewatering

operations. If excessive settlement of the streets occurs, the contractor shall arrange for design and implementation of appropriate mitigation measures.

All construction activity shall follow site safety requirements as specified by the Occupational Safety and Health Administration (OSHA) in Section 29 CFR Part 1926. The contractor shall be solely responsible for site safety. Any unsafe construction activity or hazardous conditions reported to the Construction Contractor shall be remediated immediately by the Construction Contractor or by the responsible parties under the direction of the Construction Contractor.

- G-43 **SB 1953 and Noise Mitigation.** SB 1953 was enacted in 1994, and the applicant waited until 2003 to submit permit applications and inform the City that the permits had to be issued and construction commenced by 2004 to meet the legislative deadline. The applicant's proposed construction schedule is based on numerous assumptions. With different assumptions, the construction process and duration could be altered. The intention of the State legislature in establishing the deadline was clearly to see that seismic compliance would be achieved in a timely manner. It seems unlikely that in the instance of a project proceeding ahead in good faith and only a few years from completion that the State would choose to close a hospital to acute care services for an entire region. A more likely scenario would be that State agencies or the State Legislature would issue an extension of time to allow completion. The referenced sentence on page 8-3 is revised to read:

If this deadline is not met, SBCH ~~will lose~~ could be at risk of losing its State Operating License as a general acute care hospital and would have to obtain an extension of time from OSHPD or the State legislature.

The EIR identifies Mitigation Measure N-9 as a reasonable and feasible measure to partially mitigate construction noise impacts to noise-sensitive residential and hospital uses in the project vicinity with a standard practice of limiting construction noise on evenings and weekends. The EIR recognizes that the measure could potentially result in a substantially longer overall duration of the construction process. It will be the decision-makers' charge to weigh conflicting objectives and make a final determination as to the feasibility of mitigation measures. Also refer to Topical Response 3, Construction Noise/Hours Limitation.

- G-44 **Parking Structure Design.** The revised description of the updated design of the parking structures is noted and incorporated into the Final EIR as part of these Responses to Comments as follows (revised portion is underlined). The minor revisions of the parking structure design do not alter the impacts analysis of the EIR.

PF 8-2 ***Structural Design Elements - Non-Hospital Buildings.** All proposed non-hospital buildings (Knapp parking structure, Pueblo parking structure, and child care buildings) would be designed using materials and structural elements to ensure the new buildings meet the seismic performance criteria set forth in the 2001 CBC. The structural design element of the non-hospital buildings are described below.*

- *Parking Structures. The proposed parking structures would be constructed using the long-span 36-inch-deep Cunningham beam system of reinforced concrete and post tensioning. The gravity system would consist of reinforced columns and foundations. The beams and concrete slabs would be post-tensioned, reinforced moment frames. The lower level of the structure would consist of a reinforced concrete slab with perimeter retaining walls constructed of reinforced concrete masonry or shotcrete. The exterior walls and foundations would extend to a maximum depth of 18 feet below the finished exterior ground level.*
- *Child Care Center. The proposed child care center would consist of three one-story structures of masonry or wood frame construction. The foundations would consist of a concrete slab on grade at or near the existing ground elevation.*

G-45 **Geotechnical Reports.** The comment is noted. In addition, prior to the issuance of grading permits for Phases 2A, 2B, 3, 4, 5, and 6, all requirements outlined in Mitigation Measure GEO-1, associated with the non-hospital structures (no OSHPD approval necessary) would have to be adhered to and approved by the City Building and Safety Department. No change to the EIR is required.

G-46 **Geotechnical Monitoring.** The intent of Mitigation Measure GEO-3 is to have a qualified geotechnical monitor on site during grading and construction of the project to ensure compliance with the final geotechnical reports and recommend modifications to the requirements if necessary. The City acknowledges that OSHPD has permitting authority over the hospital buildings; however, unless the OSHPD inspector is on site to monitor grading and construction activities on a regular basis, a qualified geotechnical monitor will be required. A qualified geotechnical monitor will be required to monitor grading and construction activities during construction of the nonhospital structures (parking structures and child care facility) that would not fall under OSHPD's permitting authority. The PEC for the project will be required to ensure compliance with Mitigation Measure GEO-3, including submittal of weekly reports to the City and SBCH.

G-47 **Hazardous Materials Spills.** As discussed in the Phase I Environmental Site Assessment for the project, in 1987, a 2,000-gallon fuel oil UST and an 8,000-gallon diesel underground storage tank (UST) were removed from the former Central Services Plant at 2315 Bath Street. Soil contamination was found beneath the tanks. Some of the contaminated soil was removed. However, approximately 450 cubic yards of contaminated soil that could not be excavated was left in place under the East/West Wing building. A bentonite wall was installed, and the entire area was capped with a concrete cover to prevent precipitation from leaching fuel oil into the groundwater or soil hydrocarbon vapors from escaping the subsurface into the atmosphere. The case was closed on March 13, 1995.

The database search conducted as part of the Phase I report indicated a leaking diesel UST at the former Central Services Plant location (2315 Bath Street) on September 3, 2003. Since the USTs had been removed from this location, it is possible that the leak occurred at the current Central Services Plant location and was recorded incorrectly. This leak could not be confirmed in HMU records or by SBCH staff. Since the Central Services Plant will be

relocated again as part of the project, any potential leaks would be addressed as part of the removal process (refer to Mitigation Measure HAZ-13).

- G-48 **Helicopter Flight Paths.** The comment is noted. PF 9-2 has been revised as follows, consistent with Chapter 3.0, Project Description, and as shown on Figure 11.2. Revised text has also been added to page 9-22, Aircraft Safety Impacts (Project Long-Term).

SBCH has identified helicopter procedures and flight path routes. Helicopters would be used to transport trauma cases to the hospital and are anticipated to be used on average about two times per week. Under normal weather conditions, the helicopter would follow a flight path along U.S. 101 and would make a direct approach toward the hospital after turning near the intersection of U.S. 101 and Pueblo Street. Departures would follow the same path as approaches. Under windy conditions, after turning toward the hospital, the helicopter would approach the helipad by making a gradual loop to the east prior to turning west for final approach and touchdown into the prevailing west wind. Departures in windy conditions could require direct climb and vertical takeoff over the helipad and then depart directly toward the freeway.

- G-49 **Closed Circuit TV System.** This updated information is noted. The DEIR utilized information that was available during the preparation of the DEIR. As part of these responses to comments, this updated information is included in the Final EIR. No change to the EIR impact analysis is required.
- G-50 **On-Site Sewage Treatment.** The comment is noted. This discussion provided a summary of physical constraints to providing an on-site sewage treatment plant. A detailed assessment of environmental effects of such a system is not provided, because it is not proposed as part of the project. Localized odor effects would be expected. Given the location next to medical and residential uses sensitive to odor, all feasible mitigation would be required; however, some level of localized residual odor would be likely.
- G-51 **Future Phase Under Specific Plan/Hazards.** Please see Responses to Comments G-2 and G-24 regarding evaluation of potential environmental impacts and feasible mitigation measures of future development permissible under the Specific Plan as part of the EIR analysis. Section 9.6.3 of the EIR identifies potential impacts of future Specific Plan development to be similar to the proposed project and therefore requires mitigation measures similar to those identified for the proposed project. As stated previously, it is appropriate to identify these mitigation measures at this time. If necessary, further evaluation of environmental effects will be undertaken when future development allowed under the Specific Plan is undertaken.
- G-52 **Helipad Permitting Jurisdiction.** In accordance with California Code of Regulations Title 21 Sections 3525–3560, documentation of action by the Airport Land Use Commission of the county in which the heliport is located (SBCAG) will be required as appropriate. A Notice of Landing Area Proposal must be submitted to the FAA for review. In addition, a Heliport Approval Permit Application form must be submitted to the Caltrans Division of Aeronautics. Caltrans will issue the permit once it reviews and approves the application. Please also refer

to Response to Comment AA-122. Mitigation Measure HAZ-8 has been edited as follows to include Caltrans and FAA actions:

HAZ-8 Helipad. *Prior to issuance of building permits for the proposed helipad in Phase II (SBCH Phase 4), SBCH shall submit the helipad design plans, emergency response plan, and flight paths to the City Fire and Police Departments as well as the Santa Barbara County Association of Governments (SBCAG) for review. SBCH will document SBCAG's action in the application for a Heliport Approval Permit, which shall be submitted to Caltrans Division of Aeronautics. Caltrans will issue the permit once it reviews and approves the application. SBCH shall also submit a Notice of Landing Area Proposal to the FAA for review. Documentation of Caltrans approval shall be submitted to the City.*

- G-53 **Hazardous Materials Management Plans.** Mitigation Measure HAZ-4 (Hazardous Materials and Waste Control Plan) is applicable throughout project operation and addresses measures for handling, storing, and disposing of hazardous materials and waste. Mitigation Measure HAZ-9 (Construction Hazards Management Plan) is only applicable during the construction period, when processes and equipment locations to manage fire hazards, emergency response, public security, hazardous materials, and waste may be altered somewhat by construction status and transportation detours.
- G-54 **Text Correction.** The word correction is provided in the FEIR, page 10-7.
- G-55 **Project Feature PF 10-1, Hospital Storm Drain.** The term “RCB” has been removed from the sentence. The removal of this specific type of drainage conduit does not result in any changes to the proposed hydrology calculations or disclosed impacts and project features.
- G-56 **Project Feature PF 10-3, Child Care Storm Drain.** The EIR has been updated to accurately describe that the storm drain shown in EIR Figure 10.3 and Technical Report (Figure 5) is providing drainage for the proposed child care center and not the Pueblo parking structure, as previously described. The Pueblo parking structure will drain to Pueblo Street and Castillo Street via a systems of pipes, downspouts, gutters, and parkway culverts. This clarification does not alter the proposed hydrology calculations.
- G-57 **Project Feature PF 10-4, Concrete Box Storm Drain.** The EIR has been updated to clarify the flows from Mission Creek. The phrase “intercept flows from Mission Creek” is referring to the overbank flows from Mission Creek upstream of the project site that occur during a 100-year design storm.
- G-58 **Project Feature PF 10-5, Mission Creek Outlet.** The Draft EIR and corresponding Hydrology Technical Study reported an energy dissipater at the proposed inlet into Mission Creek. Upon further review of the proposed system, an energy dissipater (PF 10-5) is not required based on policies and criteria set forth in U.S. Army Corps of Engineers design standards for side connections into fully concrete-lined flood control channels. Hydrology and Hydraulic Policy Memorandum Number 1: Side Drain Connections into Flood Control Channels, specifies the criteria for connecting into Mission Creek from the proposed culvert inlet including maximum permissible angles of entry, minimum submergence, and outlet structure invert clearance. The proposed project will be designed to be consistent with these

- criteria, and the Santa Barbara County of Public Works Department review process of the detailed design drawings will verify substantial conformance to these criteria. The EIR and technical study have been updated to reflect these changes. The removal of this project component does not alter the post-hydrology conditions or impact assessments previously identified.
- G-59 **Storm Drain System.** The EIR states that with implementation of PF 10-4 (Concrete Box Storm Drain), the project feature would remove storm flows from the surrounding streets. The EIR has been modified to reflect that PF 10-4 will serve to reduce (not remove entirely) surface flows for the surrounding streets, with the largest reductions in surface flows focused within the vicinity of the Junipero Street/Castillo Street intersection. The streets will continue to be used as part of the City storm drain system to convey flows downstream. This clarification does not alter the proposed hydrology conditions of impact assessments, and evidence of flows within the streets under the proposed condition is further supported by Table 10.K in the DEIR.
- G-60 **Energy Dissipater.** Please see Response to Comment G-58 regarding an energy dissipater at the storm drain outlet into Mission Creek. This correction has been made in the EIR.
- G-61 **Storm Flows.** Please see Response to Comment G-59 regarding storm flows. This correction has been made in the EIR.
- G-62 **BMPs in Rights-of-Way.** The comment requests further clarification of the best management practices (BMPs) responsibilities during the construction phase within any public rights-of-way. The applicant will be responsible for maintaining all construction BMPs related to any project improvements made within the public right-of-way on the City's behalf. The applicant will not be responsible for construction BMPs for those improvements within the right-of-way being provided by the City as part of its Capital Improvements Projects plan.
- Mitigation HYD-10 Flood Hazard Reduction Plan.** The reference to dry weather flows is not part of the Flood Hazard Reduction Plan, and this has been corrected in the FEIR. The City's Flood Hazard Reduction Plan will require the applicant to ensure that flood prevention BMPs will be maintained during the construction phase of any applicant-sponsored improvements made within the public right-of-way.
- G-63 **Typographical Error.** The error has been corrected in the FEIR.
- G-64 **Figure 10.5, Existing Drainage.** The north arrow has been modified in Figures 10.2 and 10.5 in the FEIR.
- G-65 **Hydrology/Hydraulics Study.** This is a standard development requirement. The EIR recognizes that the project construction and associated building permit processes will occur in phases. As provided by Mitigation Measure HYD-1, prior to each permitted construction phase, including for the Central Plant and Pueblo parking structure, the applicant will be required to submit adequate hydrology and hydraulics information, as determined by City Public Works Engineering and Building and Safety Division and/or OSHPD. Different levels of information may be appropriate for various stages and structures. Refinement of this

- measure, including clarification of timing issues, may occur prior to decision-maker application of the measure as a condition of project approval.
- G-66 **Letter of Map Revision.** This is a standard development requirement. Mitigation Measure HYD-2 is clarified as follows: *During final project design, and prior to the issuance of any grading permits, the applicant shall submit detailed applications, certification forms, and hydraulic analyses and obtain pre-review and approval from the City floodplain manager. The applicant shall also submit the completed Conditional Letter of Map Revision (CLOMR) application and obtain conditional approval from the Federal Emergency Management Agency (FEMA). Upon completion of project construction work within the floodplain, the applicant shall submit “as-built” construction documentation verifying conformance with the CLOMR to obtain pre-review and approval from the City floodplain manager, and shall submit the completed Letter of Map Revision (LOMR) application to obtain approval from FEMA.*
- G-67 **Flood Hazard Reduction.** This is a standard development requirement. As noted in Response to Comment G-65, the EIR recognizes that the project construction will occur in phases. Mitigation HYD-3 provides that prior to grading and building permit issuance for each structure, the applicant will submit adequate information demonstrating compliance with applicable provisions of the City Flood Hazard Reduction ordinance, as determined by the City and OSHPD.
- G-68 **Water Pollution Control.** This is a standard development requirement. Mitigation Measure HYD-4 provides that, prior to permits for each phase of development, adequate water pollution control measures will be required, as determined by City Public Works Engineering.
- G-69 **Construction Erosion Control Plan.** This is a standard development requirement. Mitigation Measure HYD-9 provides that, prior to permits for each phase, adequate erosion control plan and best management practices information will be required as determined by City Public Works Engineering.
- G-70 **Construction Flood Hazard Reduction.** This is a standard development requirement. Mitigation Measure HYD-10 provides that, prior to grading permit issuance, adequate information demonstrating compliance with City applicable flood hazard reduction ordinance provisions will be required, as determined by City Public Works Engineering.
- G-71 **Noise Criteria.** Noise level criteria used to assess potential noise impacts of the project include the 24-hour weighted average noise guidelines for exterior hospital and residential uses (in terms of Day-Night Average Noise Levels [L_{dn}] or Community Noise Equivalent Level [CNEL]) in the City’s Noise Element of the General Plan, Municipal Code, and Building Code. In addition to these weighted average noise standards, maximum noise levels generated by the short-term and long-term operations of the project would also affect noise-sensitive areas adjacent to the project site. For analysis purposes, criteria from the State of California’s Model Community Noise Control Ordinance and the Federal Transit Administration’s Groundborne Vibration and Noise Impact Criteria were used to assess potential community annoyance impacts associated with maximum noise and vibration levels.

Sound Pressure Level. The comment is correct that sound power level (PWL) is independent of distance from a source. In the EIR, mechanical equipment was analyzed with a Sound Pressure Level (SPL) of 104 dBA at one foot. Text on page 11-6 in the EIR has been revised to clarify this as follows: *The combined Sound Pressure Level (SPL) from the Central Plant building is estimated to generate a noise level of 104 dBA L_{max} at a distance of one foot.* Text on page 11-25 in the EIR has been revised to state: *Typical maximum noise generated by mechanical equipment was obtained from the Noise Control for Building and Manufacturing Plants (Bolt, Beranek and Newman Inc., January 1987), which lists sound power level generated by cooling towers, boilers, and generators. Two two-cell cooling towers would generate a sound power level of 104 dBA, three boilers at 104 dBA, and four emergency generators at 110 dBA. These noise levels are used and converted into sound pressure level (SPL) perceived by the human ear. Mechanical equipment would generate a noise level of 104 dBA at a distance of one foot.* Revisions have been made throughout the document to state that mechanical equipment generates a SPL of 104 dBA at one foot. The noise analysis and conclusions in the EIR do not change.

G-72a **Helicopter Noise Impact.** The commentator's opinions are noted that question the noise criteria used and state that the identified impact significance of helicopter noise effects is overstated in the EIR. City Staff and the EIR preparers disagree. As noted in the adopted City General Plan Noise Element, the State Legislature directed that required City Noise Elements recognize guidelines adopted by the Office of Noise Control pursuant to the Health and Safety Code. Many cities have adopted noise ordinances based on the State of California Model Community Noise Control Ordinance established in 1977 by the Office of Noise Control, California Department of Health. These maximum daytime and nighttime noise levels evaluate potential noise impact to noise-sensitive land uses from all stationary noise sources, such as mechanical equipment and transportation sources with infrequent occurrence, such as helipads or truck loading/unloading. Because the proposed helicopter operations are infrequent, it was evaluated with both L_{max} and L_{dn} to identify both short-term, single-event exposure levels and long-term average noise impacts. Helicopter operations were evaluated for nighttime events as a worst-case scenario. The EIR analysis is that an occasional daytime helicopter operation would not be considered a significant noise impact, one nighttime helicopter event would result in community annoyance (adverse but not significant impact), and two nighttime helicopter events would result in potentially significant nighttime noise impacts based on the projected L_{dn} .

G-72b **Loading Dock Sound Wall.** Vehicles along Oak Park Lane would generate noise levels that exceed the daytime and nighttime maximum noise levels at the hospital outdoor active use area. Vehicular traffic noise from public streets is exempt from the City's noise ordinance. Under CEQA, environmental impacts are considered for on-site as well as off-site sensitive uses. As revised in the Final EIR, on-site maximum noise generated by the hospital's loading dock would periodically cause community annoyance to the hospital's outdoor active use area; however, this is considered an adverse but not significant impact. Therefore, Mitigation Measure N-6 is now a recommended measure to reduce any noise levels that could affect the outdoor use area above the daytime and nighttime maximum levels. In addition, please refer to Response to Comment G-72a for discussion on the L_{max} threshold.

- G-72c **Vibration Impacts to Medical Equipment.** Section 11.7, Noise and Vibration Impacts, Temporary Construction Impacts, identifies potential construction vibration effects to the hospital's vibration-sensitive equipment. As construction would be conducted in different phases and would last approximately nine years, coordination between the construction contractor and SBCH, as suggested in Mitigation Measure N-7, would protect vibration sensitive equipment from heavy construction activity. Mitigation Measure N-7 is appropriate and would reduce the potential for damaged medical equipment when implemented through applicant and contractor coordination.
- G-72d **Limitation of Construction Hours to Reduce Noise Impacts.** The commentator's opinions are noted. The City Municipal Code identifies minimum limitations on construction days, hours, and noise levels that apply throughout the City to all projects. This does not preclude an EIR from identifying, nor the City from applying, more stringent limitations of construction hours as mitigation to reduce significant noise impacts of particular projects, consistent with General Plan Noise Element policies. CEQA requires that feasible mitigation measures be identified. The City has routinely applied construction hour limitations beyond those in the Municipal Code to projects substantially affecting noise-sensitive land uses, such as residents and hospital patients. In this instance, the project is a large one that involves a substantial amount of heavy construction work and equipment, located in close proximity to both hospital patients and residents, and for an extensive duration of almost a decade. (Also see Topical Response 3, Construction Noise/Hours Limitation.) Reduction of the hours per day and restriction of the weekend hours is a feasible measure and standard approach for reducing daily noise disturbance and providing patients and residents some daily respite from the noise during quieter morning, evening, and weekend hours. The EIR acknowledges that this measure would substantially increase the duration of the construction timeline, which is problematic to a primary project objective of meeting the project deadline imposed by SB1953, and also problematic in terms of project cost. The project decision-makers will be charged with a final determination of mitigation feasibility, based on their consideration of environmental, economic, social, and legal factors, public input from the community, neighbors, and applicant, and their weighing of sometimes competing objectives.
- G-73 **Stationary Source Noise from Central Plant.** The comment is correct that the Central Plant Building would have no operable windows, and all openings are acoustically treated. The text has been revised to reflect this point. Text on page 11-6 in the EIR has been revised to state: "As the equipment is housed inside a building, the building would provide a sound level reduction of at least 24 dBA with no open windows." This revision does not alter the impact significance conclusion presented in the EIR.
- G-74 **Sound Pressure Level.** Please refer to Response to Comment G-71 regarding PWL. The text has been revised to clarify that typical maximum noise levels generated by mechanical equipment were obtained from the Noise Control for Building and Manufacturing Plants (Bolt, Beranek and Newman Inc., January 1987), and mechanical equipment from the Central Plant was analyzed with a Sound Pressure Level (SPL) of 104 dBA at one foot.
- G-75 **Long-Term Noise Mitigation.** The EIR analysis identifies noise effects from helicopter noise as a potentially significant impact, and Mitigation Measures N-1 (Helicopter Operations Plan), N-2 (Annual Helicopter Operation Evaluations), and N-3 (Helicopter Activity

Records) are all required measures to (partially) reduce a significant impact. The EIR identifies noise effects from hospital mechanical equipment as adverse but not significant, and Mitigation Measure N-4 (Mechanical Equipment Testing) is recommended to further minimize this impact. Noise from truck deliveries and loading is identified as a periodic community annoyance that would be adverse but not significant. Recommended Mitigation Measures N-5 (Truck Deliveries and Loading Dock Hour Limits) and N-6 (Loading Dock Noise Barrier) are recommended to reduce the effect of noise from the loading dock activities on nearby sensitive residential and hospital outdoor use areas.

G-76 **Helicopter Noise Mitigation Measures.** EIR Mitigation Measure N-1 already states that it prohibits nighttime helicopter operations “with the exception of emergencies.” The measure would not apply to helicopter operations in an emergency.

G-77 **Delivery and Loading Dock Hour Limits Mitigation.** The comment is noted. The FEIR analysis has been revised to clarify that truck loading and unloading activities would be periodic, short-term events that would meet but not exceed the maximum nighttime noise level of 70 dBA L_{max} , recommended by the Model Community Noise Control Ordinance guidelines. This would result in community annoyance, an adverse but less than significant noise impact to residential uses located along Oak Park Lane and Junipero Street. Recommended Mitigation Measure N-5 would limit truck loading and unloading activities to daytime hours between 7:00 a.m. and 10:00 p.m. to minimize this adverse noise effect to nearby sensitive receptors to the extent feasible.

G-78 **Loading Area Barrier Wall Mitigation.** As discussed in Response to Comment G-72b, a noise barrier is recommended to protect the hospital’s on-site outdoor active use area from periodic noise associated with the loading dock activities. Although an eight-foot-high sound barrier would be sufficient based on preliminary evaluation, an acoustical engineer should review the location and height of the sound barrier once the final design detail is available.

Project plans could be engineered to provide for the noise mitigation barrier without causing a flooding effect. A Y-shaped storm drain is proposed on project plans across the bottom third of the Service Yard area where the loading docks are sited. This storm drain would be sized appropriately to control surface flows and would be able to protect a noise wall along the south side of the service yard adjacent to the outdoor use area of the new hospital. The engineer would need to evaluate this as part of final design. It also may be possible to design some small openings at the bottom of a noise wall such that some drainage could pass through if necessary, as long as the noise-attenuating characteristics are not substantially compromised.

G-79 **Vibration: Crack Survey.** Mitigation Measure N-8 in the DEIR provides for crack survey and video reconnaissance for structures located within 500 feet of the project site. The project construction vibration analysis conducted by Fugro West, Inc., dated September 2, 2003, in response to City Staff questions, concludes that maximum vibration generated by construction could be potentially damaging to structures within 10 feet of the activity. The vibration at maximum frequency may be perceptible at 100 feet and would be unlikely to be noticed at 200 feet from the construction equipment. Based on the construction vibration findings by Fugro West, Inc., the distance required for crack survey and video reconnaissance

is revised to a distance of 150 feet from the construction equipment. The EIR noise technical analyst recommends this distance as a conservative distance to capture properties affected. This revision is also consistent with Figures 11.4 through 11.6, showing the recommended areas where crack survey and video reconnaissance would be required.

Mitigation Measure N-8 on page 11-61 in the DEIR has been revised as follows:

N-8 Prepare a Crack Survey and Video Reconnaissance. *Prior to issuance of demolition permits, SBCH or its designee shall prepare crack survey and video reconnaissance documenting the existing condition of the hospital structure that would remain and neighboring structures that are within 150 feet of the project site and are over 20 years old prior to project construction. After each major phase of construction, as identified in the EIR, pages 3-20 through 3-24 and Figure 3.10, a follow-up crack survey and video reconnaissance of neighboring structures shall be conducted to determine whether any new cracks or other damage have occurred. The City and SBCH shall review the results of both pre- and postconstruction surveys to determine whether any new damage resulted from project construction activities. SBCH would be responsible for the cost of damage to structures due to project construction. Figures 11.4–11.6 show the potential areas that would require a crack survey and video reconnaissance documentation.*

Vibration impacts from construction have been analyzed appropriately and would not alter the conclusions presented in the DEIR.

- G-80 **Construction Hours Mitigation.** Please see Topical Response on Construction Noise/Hours Limitations and Response to Comment G-72d. The commentator's remarks that extending the construction timeframe by 3.5 years is unacceptable and will not meet SBCH's objective to complete construction by 2013 are noted and will be forwarded to decision-makers for consideration. The additional information related to construction phases and noise levels will be included in the record as part of these response to comments in the FEIR. Either scenario of construction hours (identified in the EIR or proposed by the applicant) would result in significant, unavoidable construction noise impacts. The EIR recognizes that Mitigation Measure N-9 would reduce daily noise disturbance impacts but would extend the duration of construction. The decision-makers will make final determination on mitigation feasibility.
- G-81 **Neighborhood Noise.** The project will employ a large number of construction workers in a location surrounded by noise-sensitive medical and residential land uses. The intent of Mitigation Measures N-14 and N-17 is to minimize potential noise and disruption to the surrounding neighborhood of residential and medical uses associated with groups of workers arriving, departing, and on breaks. The specific wording of the measures can be refined by decision-makers to clarify limitations and implementation at the time the measures are considered for application as conditions of approval.
- G-82 **Reclaimed Water Use.** Project Feature PF 12-3 has been revised to reflect the use of reclaimed water for exterior irrigation (the text "if available" is deleted). This additional information does not alter the analysis or conclusions in the DEIR regarding water consumption. Revised PF 12-3 reads as follows:

Interior and exterior water conservation measures would be incorporated into all project areas. These include, but are not limited to, low-flush toilets/urinals, low-flow faucets, water-conserving dishwashers, flow restrictors, efficient irrigation systems to minimize runoff and evaporation, and the use of reclaimed water.

- G-83 **Solid Waste Management.** Project Feature PF 12-5, item F, has been revised to reflect the 40-yard dumpster for green and large debris, as follows:

F. Establish a separate open-top, 40-yard dumpster ~~collection bins~~ for green waste and large debris, which would separate it from other wastes in the open dumpster.

- G-84 **Utility Undergrounding.** The City acknowledges that SBCH has accepted the undergrounding of six utility poles as required by the Municipal Code. The City is aware of SBCH's request for relief from undergrounding four poles due to unique circumstances related to schedule and cost. This request will be forwarded for decision-maker consideration. City Staff will recommend to the Planning Commission that all utility poles fronting the subject property be undergrounded, including one at the intersection of Oak Park Lane and Pueblo Street and one at the intersection of Fletcher and Junipero Streets.

- G-85 **Gas and Electricity Consumption.** EIR page 12-18 does not state that the project is consistent with national energy consumption standards, nor does it state the presence or absence of a natural gas or electricity supply shortage.

As shown in Chapter 12.0, the existing and proposed consumption of natural gas and electricity usage was estimated by using energy demand factors (cubic feet/square foot for natural gas and kilowatt/hour/square foot for electricity) provided by the U.S. Energy Information Administration. Since these factors assign a given amount of natural gas or electricity per square foot, the individual generation factors were then multiplied by the square footage of the existing hospital and the square footage of the proposed reconstructed hospital and appurtenant uses to obtain the total estimated natural gas and electricity consumption per year.

Based on these calculations, the proposed project would consume an additional 24 million cubic feet of natural gas and 20 million kilowatts of electricity per year. This is a substantial increase over the existing hospital's consumption of natural gas and electricity; however, there are sufficient energy resources and systems in place to serve the project. The increased energy use for this facility is therefore an adverse but less than significant impact. The EIR text has been revised to clarify that this is identified as an adverse but less than significant impact. Mitigation Measure PS-4 (LEED certification) is included as a recommended measure that would provide for design features to be incorporated into the project for energy efficiency, renewable energy use, waste reduction, and water conservation that would reduce the energy consumption effects of the project.

Also please refer to Topical Response 4 on Green Building and energy conservation issues.

- G-86 **Corrections.** The word "treatment" has been removed from the Central Plant description in Table 12.G. Phase 4 has been identified as Phase 5.

G-87 **Energy Conservation Mitigation.** Please see Topical Response 4, “Green” Building Design.

G-88 **Kaku Traffic/Parking Study.** The Traffic and Parking Study prepared by Kaku Associates was part of the collection of applicant technical reports that were available for public review at the City Planning Division. The Kaku study is now included in Appendix J of the Final EIR. Please see Topical Response 1 regarding trip generation and Response to Comment G-120 regarding baseline.

G-89 **Surface Parking.** The surface parking lots were inadvertently left out of the proposed parking supply in the DEIR analysis of parking demand resulting from the project. The surface parking lots are included in the Project Feature PF 13-1 description and the refined parking analysis in the Final EIR.

G-90 **Overstatement of Average Daily Traffic Trips.** The statement made in the Draft EIR that “the *Kaku observations* only account for a portion of the trips generated by the hospital” is correct. This is acknowledged both in the EIR and on page 45 of the Kaku study (Appendix J), which states:

“These traffic volumes, however, do not represent the total volume of traffic generated by the hospital. As discussed in the analysis of the parking system, approximately 9% of the employee traffic and 55% of the customers park in on-street spaces in the neighborhood surrounding the hospital.”

The Kaku study is the source of the raw data (i.e., driveway traffic counts) used to calculate the existing and future trip generation in the Draft EIR. The commentator’s assertion that the trip generation contained in the Kaku study accounts for more than a portion of the trips generated by the hospital is correct and is not disputed by the Draft EIR. Rather, the existing trip generation was simply calculated using the same raw data, but by a different method than the Kaku study. Please see Topical Response 1, Trip Generation, for further explanation of the trip generation methodology utilized in the EIR.

G-91 **Overstatement of Peak-Hour Traffic Trips.** The existing peak hour traffic volumes stated in the Draft EIR were taken from Table 9 in the Kaku study (Appendix J). According to Table 9, 367 total vehicle trips were counted between 7:00 a.m. and 8:00 a.m. on July 30, 2003, and 332 total vehicle trips were counted between 4:00 p.m. and 5:00 p.m. on July 29, 2003. General traffic engineering practice dictates that the a.m. peak hour occurs during the highest one-hour period between 7:00 a.m. and 9:00 a.m., and the p.m. peak hour occurs during the highest one-hour period between 4:00 p.m. and 6:00 p.m. The existing traffic volumes used in the Draft EIR and taken from Table 9 in the Kaku study are an appropriate estimate of existing peak-hour trips. Rather than ignoring the difference between the peak hour of the adjacent street and the peak hour of the generator, as asserted by the commentator, the highest observed hourly volumes at the project driveways between 7:00 a.m. and 9:00 a.m. and 4:00 p.m. and 6:00 p.m. were selected.

The comment goes on to assert that the percent difference between on- and off-street parking demand cannot be applied to on- and off-street trip generation to determine the trip-making

potential of the hospital. The EIR preparers disagree with this opinion, as each vehicle parked on- or off-street would generate a trip destined to the hospital. Therefore, there is a direct relationship between parking and trip-making, and it is reasonable to utilize these two variables when determining the trip generation of the hospital.

- G-92 **Trip Generation Methodology: Patient Trip Characteristics.** Based on the patient volumes provided in the Cottage Health System Modernization and Seismic Compliance Plan, *Past, Present, and Projected Volume and Capacity* (2004), outpatients currently account for approximately 79.4 percent of total patient volumes. By 2014, outpatients are forecasted to account for approximately 78.6 percent of the total patient volumes, a change of less than one percent. Because the ratio of inpatient to outpatient volumes is not forecasted to change significantly, the existing trips per patient are a good indicator with which to forecast future trip generation.

The trip rate per 1,000 yearly patients takes into account the trip characteristics of different types of patient trips because it is based on existing, observed vehicle trips, which are made up of many types of hospital users (inpatients, outpatients, staff, doctors, visitors, etc.). The trip rate does not differentiate between employee and visitor trips or any other type of trip, as stated in the comment. Rather, the trip rate takes into account all of the trips that would be associated with a particular variable; in this case, each patient.

It does not follow that because the DEIR trip generation calculations result in a higher trip generation than the Kaku study (Appendix J), that this means that LSA is overstating the trip generation. The Kaku study was prepared by the applicant's consultant, and was not approved by the City of Santa Barbara for use, in whole, in the Draft EIR. The methodologies contained in the Kaku study are not a benchmark by which to evaluate the LSA traffic analysis. Although the Kaku study calculates trips based on a complicated operational methodology, this does not mean that the EIR approach for deriving a rate-based trip generation methodology for the project is an invalid approach. The Institute of Transportation Engineers, *Trip Generation*, 7th Edition, the most accepted trip generation reference in the nation, uses this type of methodology, where a trip rate is derived based upon observations of an existing land use.

- G-93 **Perimeter Intersections.** The EIR states that there are eight intersections surrounding the hospital, which is accurate. The intersections are Bath/Pueblo; Bath/Nogales; Bath/Junipero; Junipero/Castillo; Junipero/Fletcher; Junipero/Oak Park Lane; Oak Park Lane/Pueblo; and Castillo/Pueblo.
- G-94 **Neighborhood Circulation Improvements.** The commentator's opinions regarding neighborhood circulation improvements are noted and will be forwarded for decision-maker consideration. No further response or change to the EIR is required.
- G-95 **Surface Parking Lots.** The surface parking lots were included in the existing parking supply counts in the EIR, but were inadvertently left out of the proposed parking supply in the analysis of project parking demand. Also refer to Topical Response 6 and Response to Comment G-16. They are included in the refined parking analysis in Chapter 13.0 of the Final EIR as well as the Traffic Study.

- G-96 **Parking Demand Table.** The commentator's opinion is noted. Please see Response to Comment G-14. As previously stated, the EIR utilizes the initial employee count estimate identified. These numbers represent a reasonable worst-case scenario and are therefore appropriate to use when calculating and assessing potential impacts under CEQA.
- G-97 **Mitigation Measure TRF-1, Project Study Report for Vehicle Overcrossing.** The EIR traffic analyst considered several potential intersection improvements as mitigation, but they were all determined physically infeasible. The project study report for a vehicular overcrossing at Junipero is a proportional mitigation for the level of project-related impacts and in the view of City Staff and the EIR preparers, constitutes the best choice for mitigation. The actual overcrossing is anticipated to reduce the impacts at three of the impacted intersections; however, funding the entire overcrossing far exceeds the nexus of the project impact. Therefore, the EIR appropriately identifies the project study report portion of the total cost of this mitigation as a feasible measure to partially address the impacts. While the preparation of a study report does not in and of itself result in actual reduction of impacts, it is a critical first step to a fair-share portion of the full process and cost of the mitigation. CEQA does not preclude this type of mitigation. It precludes taking full mitigation credit for this type of mitigation when identifying post-mitigation residual impact significance. The EIR has recognized that there would remain a residual significant traffic impact of the project.
- G-98 **Traffic Impact Significance/Requirement for Mitigation Measure TRF-2.** The commentator's opinion is noted. Please see Topical Response 1, Traffic Trip Generation, and Responses to Comments G-88 through G-97. The EIR identifies a significant long-term traffic impact and identifies Mitigation Measure TRF-2 (Mission Street/U.S. 101 southbound ramp) as a feasible measure to reduce traffic effects of the project.
- G-99 **Mitigation Measure TRF-3, Parking Cash-Out Program.** The EIR identifies this measure as a means of feasibly reducing project traffic impacts. The measure would provide an incentive, not requirement, for employees to receive back in cash the cost of parking fees if they choose to use alternative transportation and not drive and park a vehicle. There would be no performance standard for effectiveness; that is, there would be no requirement for any actual specified employee trip reduction level. The decision-makers will make final determinations on the feasibility of mitigation measures for the project.
- G-100 **Mitigation Measure TRF-4, Additional Parking Spaces.** Please see Topical Response 6, Revised Parking Demand Analysis. The parking demand analysis has been corrected to reflect proposed surface parking lots providing 61 spaces as part of the project parking supply. The revised parking demand analysis shows that the project as designed would provide sufficient parking with the two parking structures and surface parking lots to meet the parking demand of the project, and no significant parking impact would result. Mitigation Measure TRF-4 (Additional Parking Spaces) is not necessary and has been deleted from the Final EIR.
- G-101 **Mitigation Measure TRF-5, Construction Parking.** The omission of the surface parking spaces in the project parking supply would not affect the conclusions of the parking analysis during construction. During Phase I, several existing parking lots and structures will be

demolished, resulting in a shortage of parking for hospital patrons, employees, and construction workers. The new surface parking spaces would not yet be constructed, and therefore would not be available during construction Phase I. However, with the construction of the new Pueblo and Knapp parking structures during Phase I, the construction parking impact would be mitigated, as noted in the DEIR. As a result, no changes to the construction parking analysis are required based on the omission of parking spaces in the project parking supply.

- G-102 **Photosimulations: Architecture.** The Draft EIR on page 14-16 acknowledges that the project design has undergone several conceptual reviews by the Planning Commission and the Architectural Board of Review (ABR), which have provided direction for refinements to the project design. The photosimulations included in the DEIR depict the design of the project as proposed by the applicant in April 2004, when preparation of the Draft EIR commenced. Refinements or changes made to the project by the ABR during its ongoing conceptual reviews of the design have not been substantial with respect to overall size, bulk, and scale or other aspects that would modify the visual impact assessment and therefore do not change the conclusions of the Draft EIR analysis. The evolution of the design since then will be documented and forwarded to the Planning Commission via the Staff Report for their review and consideration. It is acknowledged that the proposed main hospital facility does not currently include a domed tower as part of the project design.
- G-103 **Photosimulations: Landscaping.** The updated landscaping refinements are noted. As with the architectural design, the conceptual landscape design of the proposed project is evolving over time based on discussions with the Planning Commission and Architectural Board of Review. The EIR makes it clear that the project design is subject to several stages of discretionary design review per the required City permit process. The EIR analysis utilized the project description identified by the applicant, including the landscape plan submitted to the City in April 2004 as part of the applicant's application submittal, which included a tree disposition plan. The visual simulation reflects the landscape concept and disposition as identified in these documents. It is recognized that the design has evolved since the application submittal, often resulting in improvements to other aesthetic features of the structure and the buffering of views from adjacent roadways and land uses. The view analysis provided in the EIR represents a reasonable worst-case analysis of project impacts, which finds potential visual impacts of the proposed project associated with scenic views, aesthetics, and compatibility to be adverse but less than significant. The landscaping refinements do not involve a substantive change to the EIR impact analysis, and no change to the EIR is made.
- G-104 **Architectural Style.** Please refer to Response to Comment G-13 regarding the project's architectural style. No changes to the wording in Project Features PF 14-1 (Architectural Design) or 14-2 (Landscape Plan) are necessary.
- G-105 **Street Lights.** City of Santa Barbara Public Works Department standard street light requirements provide for placement of Type A (Commercial) streetlights (Standard Detail 3-001) on all street frontages per City Standard 3-005.0. Per Note 4, where commercial or industrial lot frontages are involved, light standards are spaced 100 feet apart. There is no residential use fronting the subject property. Light standards on existing utility poles would

be retired by City Staff, and pedestal meters would be installed by the project. The EIR evaluated project lighting impacts from additional street lights, assuming standard City street light requirements would be applied, which constitutes the reasonable worst-case assumption of lighting impacts. No change to the EIR is required. City standard street light requirements are based on public safety considerations for travel, and it is expected that Public Works Staff will recommend that decision-makers apply standard street light requirements to the project. Any comments from the applicant or neighborhood proposing variation from City standard street light requirements would be forwarded for decision-maker consideration.

G-106 Project Feature PF 14-4, Interior Lighting. Cottage Hospital assured the City that it is part of the hospital's existing standard operational procedures and a proposed continued operational procedure of the project that window coverings are drawn for privacy during early evening hours. The EIR analysis that interior lighting would be a negligible contribution to project lighting impacts was based on this project feature and the assumption that window coverings would be closed at night. No change to the EIR is necessary at this time. If SBCH chooses to change the project description and project features on which the environmental impact analysis is based, the adequacy of the analysis may require reassessment, or decision-makers may consider conditions of approval to address the change.

G-107 Pueblo Parking Structure Lighting Impacts. The EIR analysis utilized the photometric study provided by the project applicant to assess potential lighting impacts. The project contribution to lighting levels, identified in the photometric study for the area around the Pueblo parking structure, is 0.0 foot candles (fc) at the property line, based on project design assumptions that the east and south sides of the parking structure would be closed and therefore would shield the adjacent uses from any increase in ambient lighting levels. The refinement of the project design to incorporate three second floor windows along a portion of the south elevation would allow some lighting to be emitted to the south. However, the first floor of the building extends out in that area, and the second floor and windows in this location are set back approximately 26 feet from the first floor. The overall net change in the lighting at the property line would be less than 0.1 fc, in compliance with the City's Outdoor Lighting Design Ordinance and Guidelines, and would not create a significant impact to adjacent properties. Also, the design changes provide for the location of lighting fixtures on roof decks to be moved more to the center of the structure, which further reduces the overall cumulative lighting emitted outside the structure in all directions. The Architectural Board of Review considered the refined lighting plan in Conceptual Review and found it to be acceptable per City design guidelines.

G-108 Alternatives. The EIR includes Table 15.A (Summary Comparison of Alternatives, pp. 15–50), which provides a summary of alternatives with respect to meeting objectives and environmental impact levels compared to the project as proposed. An additional table with the same information has been placed at the end of the Chapter 1.0, Executive Summary, and identified as Table 1.B.

G-109 Growth-Inducing Impacts. The language “growth-inducing impact” is per CEQA Guidelines Article 9 (Contents of Environmental Impact Reports), Section 15126.2.

The comment is correct that several of the figures in Table 16.A of the Draft EIR are incorrect. The corrections are incorporated into the Final EIR for Chapter 16.0.

- Based on Santa Barbara County Association of Governments (SBCAG) forecasts (Congestion Management Program 2003) for the South Coast Subregion, which includes the City of Santa Barbara, employment growth is estimated to increase by 43.5 percent between the years 2000 and 2030. Therefore, the employment figure for the City of Santa Barbara in 2030 is corrected to 68,534, an increase of 43.5 percent over the 2000 figure (47,759). The correction is also consistent with the overall County employment increase of 44.4 percent.
- G-110 **Air Quality Analysis.** Please refer to Response to Comment G-24 regarding air quality analysis and Responses to Comments G-88 through G-101, which address modifications to the Transportation Chapter of the DEIR.
- G-111 **Arborist Report.** The assessment of the Moreton Bay fig tree prepared by Bill Spiewak and submitted to the City by the project applicant was reviewed and considered in preparing the EIR analysis, and this is referenced in the Final EIR. This tree assessment report is available for review at the City Planning Division office. Recommendations from the report were incorporated into Mitigation Measure B-4, as deemed appropriate by the EIR preparers and City Staff. Items identified as mitigation measures and applied as conditions of project approval are subject to monitoring for compliance per CEQA Guidelines Section 15097.
- G-112 **Moreton Bay fig.** The discussion within Section 6.6 of the EIR does not identify trespass as a primary reason for present or potential future damage to the health of the Moreton Bay fig tree. Identified potential risks to the health of the tree included root and limb damage associated with construction and over and underwatering of the tree. As noted by the commentator, the landscape design does impede pedestrian access to the Moreton Bay fig tree and would provide an improvement over existing conditions where there is direct contact between people and the tree. Mitigation Measure B-10 (Tree Protection During Construction) is augmented to state, *As determined necessary by the Project Arborist, temporary fencing shall be installed to discourage pedestrian access to the tree.*
- G-113 **Oaks and Sycamores.** The comment is noted. The size of container plants in the Landscape Plan will represent a tradeoff between providing more vegetation at initial installation versus successful establishment and long-term health, vigor, and survivability of the plants. For many plant species, installation of smaller container sizes promotes healthier growth, since smaller plants adapt easier to the new environment. Larger plants oftentimes have a harder time adjusting to new environmental conditions once planted. Final sizing of replacement trees/plants will be subject to review and approval by the ABR as part of the project Preliminary and Final Design Review.
- G-114 **Transplanted Specimen Trees.** Project Feature PF 6-1 (Preliminary Landscape Plan) reflects the removal and relocation of 10 trees within the Landscape Plan. Further relocation of impacted healthy specimen trees within the project site is supported by the City. The analysis in the EIR provides a reasonable worst-case analysis of tree removals and the potential for on-site replacement. The ability of the applicant to provide further opportunities for replacement of impacted trees on site would result in a further reduction in potential effects to localized wildlife/avian habitat. Salvage and relocation of other removed trees at

- off-site locations is also supported; identification of such trees and locations to which they are moved needs to be identified on approved project plans in order to receive mitigation credit.
- G-115 **Table 2, Tree Disposition Plan.** This refined project description information is noted. No substantive change to the EIR analysis of biological, visual, or other impacts or mitigations is required.
- G-116 **Project Plan Refinements.** The refined project description information is noted. No substantive change to the EIR analysis of environmental impacts or mitigations is required.
- G-117 **Tree Protection Plan and Arborist Report.** The revisions to the applicant's tree protection plan are acknowledged. The tree protection plan will need to incorporate the mitigation measures identified in Chapter 6.0 of the EIR, Biological Resources. As noted in Mitigation Measure B-10, fencing would be placed at the outside edge of the drip line plus six feet (not five feet as identified in the comment) or as designated by the Project Arborist. It will be up to the discretion of the Project Biologist to decide whether a reduction in this requirement is appropriate.
- G-118 **Geophysical Conditions.** The comment refers to the attached separate comment memo on the geotechnical report peer review conducted by the EIR subconsultant, Leighton Consultants. Please refer to Responses to Comments G-37 through G-42.
- G-119 **Hydrology and Water Quality Assessment.**
- Page 4: Floodplain.** The Technical Study references the December 3, 1991, date for the FIRM Map. Upon receipt of the CLOMR by FEMA dated October 8, 2003, the revised FIRM Map condition is now conditionally the official "existing condition" used for the analysis in the report and all hydrology and flood studies. This clarification is provided in the final technical study.
- Page 7: Edits.** The edits have been corrected in the technical study. See Response to Comment G-56 for the storm drain serving the child care center.
- Figures 4 and 6: North Arrows.** The north arrows have been corrected on Figures 4 and 6.
- Page 18: Drainage Measures.** The technical study has been changed to reflect the correct type of drainage conduit. This change does not alter the hydrology conditions or impact assessment.
- Page 19: Energy Dissipater.** Please see Response to Comment G-58.
- Page 36: Street Sweeping.** Santa Barbara Cottage Hospital is responsible for street sweeping of all privately maintained streets within the project boundary. The City is responsible for sweeping all publicly maintained streets. This clarification has been provided in the technical study.

Page 37: Correction. The word “will” has been deleted to remove the grammatical error in the sentence.

- G-120 **Baseline.** It is the Lead Agency’s (City’s) responsibility to identify an appropriate baseline assumption for analysis of environmental impacts resulting from the project under the provisions of CEQA. As noted in the comment’s references, agencies may approach the identification of their baseline conditions differently in different circumstances. The applicant’s opinion about the appropriate environmental baseline is noted. City staff disagrees with the applicant’s opinion in this matter. The project circumstances differ in several respects from the circumstances in the referenced case law CEQA applications.

The comment states that the same level of hospital use would occur whether or not the hospital rebuilds and that the impacts of future use levels are therefore not a result of the project. The hospital has never experienced those higher use levels, and it is not clear that the existing hospital facility would in fact accommodate future growth and space for projected additional outpatient service levels, given the constraints frequently mentioned by the applicant such as regulations for room sizes, and double vs. single room constraints. The applicant has in fact justified the large size of the proposed expansion as needed to accommodate proposed future changes in services such as outpatient services and to provide for room types and sizes in conformance with regulations and that would allow for increased efficiency (and associated intensification of use).

The 20-year-old 1984 EIR referenced by the commentator was for the Centennial wing project, and identified substantial added traffic directly associated with 72,000 square feet of new hospital space at the Northwest Wing and a parking garage. Impacts were identified as not significant due to low existing traffic levels (e.g. Mission/101 ramps at LOS B–C during peak hours) and programmed road improvements. Only a portion of the project evaluated in the EIR was built out.

The CEQA Guidelines provide that a new EIR is required to evaluate substantial changes to environmental circumstances and a completely different project with different and greater environmental impacts. Current traffic conditions are substantially worse than the traffic conditions in 1984 (currently Mission/101 ramps at LOS E–F). The current project does not just rebuild or modify an existing facility evaluated previously, but provides a replacement and very large expansion of the physical facilities (more than 200,000 s.f. net increase in hospital area plus additional parking structures and child care facility). The facility expansion would provide additional capacity for increased use beyond what the existing facility could accommodate and therefore could result in traffic impacts not previously evaluated by the existing permitted facility. The project also involves the revision of the general plan land use and zoning designation on the site through establishment of a Specific Plan and a change in the permitting process to provide for the hospital facilities as a permitted use rather than conditional use.

The Lead Agency needs to consider the environmental impact of a project using “reasonable worst-case” assumptions for impacts of the physical facility itself and planning designation changes and not just consider the current owner/occupant or use levels desired or suggested by an applicant. The City has done that. The assumptions for future growth are reasonable

and do not reflect absolute worst-case or speculative scenarios but a reasonable extrapolation of growth. The rebuilt hospital would plainly have the potential to accommodate a greater use level and intensity than the existing hospital facility, and the EIR impact analysis reflects a recognition of impacts associated with that greater use level.

H. COMMENTS FROM BOB KNIGHT

Mabuchi, Anne

From: Unzueta, Irma
Sent: Monday, November 29, 2004 3:22 PM
To: Mabuchi, Anne
Subject: FW: Planning Commission

DISTRIBUTED TO: DATE: 11/29/04
PLANNING COMMISSION (7)
JAN HUBBELL, SR. PLANNER
SCOTT VINCENT, ASST. CITY ATTY.
CASE PLANNER APPLICANT(S) AGENT
PC SECRETARY

Anne,
Please distribute.

From: Bob Knight [mailto:theknights.sbca@verizon.net]
Sent: Monday, November 29, 2004 1:27 PM
To: Unzueta, Irma
Cc: Ron Werft; 'Ron Biscaro'
Subject: Planning Commission

It is my understanding that the Planning Commission will begin discussion of the Cottage DEIR on Thursday the 2nd of December. As Chairman of the Board of Cottage Health System I would normally plan to attend and speak to several items in the DEIR. As this is a very busy time of year I will be hosting a large group of our volunteers that afternoon and early evening in order that our CEO, Mr Ron Werft can attend the Planning Commission. I would, however, like to register the following comments.

I have been Chairman of the Board for the last three years. During this time we have been working with the City, State and neighbors in the planning of our updated hospital. This project is mandated by SB 1953 which was passed after the Northridge earthquake and places very stringent guidelines on buildings serving as acute care Hospitals. As you know, we are building in place in order to capitalize on the medical infrastructure already in the area that is owned and operated by physicians and other medical technicians. We are essentially building what will appear as a new hospital even though we are taking advantage of existing structures that meet code in order to keep the hospital cost as low as possible. Since first starting our planning the cost estimates have escalated from \$350,000,000 to over \$425,000,000. This cost escalation is caused by the length of time to process through the various city and state approval processes, the constantly escalating cost of steel and other building material, and the desire on our part to make sure we provide the community with the right product.

We are not for profit. Our stakeholders are the citizens of the greater Santa Barbara community. Our Board is dedicated to providing the best Hospital we can afford in order to attract the best physicians and other medical staff in a time when living in Santa Barbara is not affordable to the bulk of our employees and private physicians and associated technical staff.

My review, although not thorough, of the DEIR seems to show a lot of "nice to haves" and some other requirements that might be placed on for profit organizations that have some control of their pricing. As a Community hospital we are at the mercy of government reimbursements (60%) and commercial insurance (35%) and the balance made up of a few private payors and the balance in charity care. We have no way to pass on the cost of such things as freeway interchanges, LEED certification, and lengthy delays in construction due to abbreviated construction hours and other nice to have features. Our hospital will have fewer beds than the current configuration which should reduce the traffic and hence the need for overpasses and we have hard dates for completion mandated by SB 1953 which require our flexible construction hours. As to environmental issues our Board and architect are very sensitive to the need to take advantage of new and innovative environmentally sound building techniques and have integrated many of these features in our plan. We are well aware of the Bren building at UCSB....unfortunately Donald Bren has not given us the money to build a similar one for the hospital. All of our funding comes from the funds generated by the hospital, our borrowing, our foundation and the largess of the community.

H-1

H-2

H-3

Our plan is sound. We have over three years invested in its development. Adding marginal requirements to the plan will necessarily delay the project due to time and cost. The citizens of Santa Barbara deserve prompt approval of our plan in order to begin to have benefit of a new and greatly improved Cottage Hospital at a cost that is affordable.

H-4

Robert T. Knight

Chairman of the Board

Cottage Health System.

H. RESPONSES TO COMMENTS FROM BOB KNIGHT

- H-1 **Cost Considerations.** The comment does not address the potential environmental impacts of the proposed project or the information or analysis contained in the Draft EIR. The commentator's opinion is noted and will be forwarded for decision-maker consideration. No change to the EIR is required.
- H-2 **Traffic Effects and Mitigation.** The EIR analysis has concluded that the SBCH project will result in significant impacts to several area intersections. Despite proposing fewer beds, the substantial additional hospital space proposed by the project (more than 200,000 s.f. net increase plus parking structures and child care center) would allow for an increase in outpatient services.. Several mitigation measures are identified to reduce vehicular impacts to less than significant levels. However, not all significant impacts to intersections would be reduced to less than significant levels, and residual traffic impacts are therefore are considered significant and unavoidable. It should be noted that Mitigation Measure TRF-1 does not require the construction of an overcrossing. Mitigation Measures TRF-1 would require the applicant to fund a Project Study Report to determine the feasibility and cost of a vehicular overcrossing from Calle Real to Modoc Road.
- Construction Hours and Deadline.** Please refer to Topical Response 3 on Noise and Construction Hours. The commentator's comments regarding completion deadlines mandated by SB 1953 are noted and will be forwarded to the decision-makers for consideration. No change to the EIR is required.
- H-3 **Green Building.** Please see Topical Response 4 regarding energy conservation and "green" building techniques. The comments regarding incorporating environmental sound building techniques into the hospital's plan and funding are noted and will be forwarded to the decision-makers for consideration. No change to the EIR is required.
- H-4 **Time and Cost.** Comments regarding the importance of time and cost will be forwarded to the decision-makers for consideration. No change to the EIR is required.

I. COMMENTS FROM DONALD M. MCINTYRE

DONALD M. McINTYRE

DISTRIBUTED TO: DATE: 11/29/04
PLANNING COMMISSION (7)
JAN HUBBELL, SR. PLANNER
SCOTT VINCENT, ASST. CITY ATTY.
CASE PLANNER / APPLICANT(S) AGENT
PC SECRETARY

REFERENCE:

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NOV 29 2004

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November 29, 2004

CITY OF SANTA BARBARA
PLANNING DIVISION

Planning Commission and
Architectural Board of Review
Community Development Department
City of Santa Barbara
630 Garden Street
Santa Barbara, California 93101

Re.: Environmental Impact Reports
(EIR)
Santa Barbara Cottage Hospital
Cottage Health System

Gentelmen:

Recently, I received an extremely disturbing communication from Ron Werft, Chief Executive Officer, of the Cottage Health System, which is attempting, with all due respect for City construction Codes, to demolish the present out-of-date medical care facilities at Pueblo and Bath Streets, and reconstruct a modern new hospital with strict adherence to State of California seismic standards.

The project proposal contained in the EIR, which would harshly restrict the duration of daily construction hours, resulting in a slow down in the rebuilding of the hospital by more than three and one-half years, is a negative and self-defeating plan that would increase construction costs; and, it could produce future astronomical cost-over-runs into the millions of dollars for this non-profit corporation. A construction schedule, which would require Cottage Health System to miss the State mandated deadline of 2013 for replacement medical facilities, is

I-1

November 29, 2004
Page 2

an unacceptable suggestion that could be detrimental to the community.

↑ I-1

Traffic in the area near the new Santa Barbara Cottage Hospital will probably increase, due to the fact the facility will be the single medical care establishment in the City of Santa Barbara. The traffic situation, however, cannot be mitigated by over-stated EIR plans and/or suggestions to limit automobile access around the medical institution. The hospital exists to care for sick patients; these individuals need life support; and, ill patients have the right to the best health care Santa Barbara can provide with clinical services.

I-2

It is my understanding the EIR draft requires the Santa Barbara Cottage Hospital to achieve conformity in Leadership in Energy and Environmental Design Certification (LEED). As you may be aware, LEED does not have any standards for hospital construction; indeed, State standards for hospital building methods prohibit many of LEED's architectural concepts.

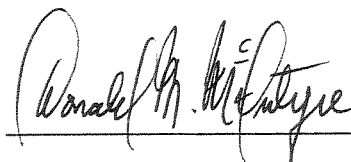
I-3

Cottage Health System's construction plan and design for the rebuilding of the new non-profit hospital for the community of Santa Barbara must be given careful consideration, so that the project meets building standards, hospital budgets, and the State mandated deadline of 2013. Unrealistic bureaucratic demands that would impair the construction progress of needed health care facilities for the community should be rejected by the Planning Commission.

I-4

Sincerely,

By:



Donald M. McIntyre

DONALD M. MCINTYRE

November 29, 2004
Page 3

cc.: Ron Werft
Santa Barbara Cottage Hospital
Cottage Health System
Post Office Box 689
Santa Barbara, California 93102

I. RESPONSES TO COMMENTS FROM DONALD M. MCINTYRE

- I-1 **Construction Hours.** Please refer to Topical Response 3 on noise and construction hours. No change to the EIR is required. The commentator's opinions regarding cost overruns and State-mandated deadlines are noted and will be forwarded to the decision-makers for consideration.
- I-2 **Traffic Impacts.** Traffic impacts related to the project have not been overstated in the DEIR, and it has not been suggested to "limit automobile access around the medical institution." Please refer to Topical Response 1 on Trip Generation regarding the DEIR analysis related to trips associated with the project. City staff agrees that individuals have the right to the best health care Santa Barbara can provide with clinical services.
- I-3 **Energy Conservation/Green Building.** Please refer to Topical Response 4 on energy conservation and "green" building, and Response to Comment G-87. No change to the EIR is required. The commentator's opinion will be forwarded for decision-maker consideration.
- I-4 **Building Standards, Budgets, and Deadlines.** The comment is noted regarding unrealistic demand that would impede the construction progress of the project. No change to the Final EIR is necessary. This comment will be forwarded to the decision-makers for their consideration.

J. COMMENTS FROM SHERRY LAFLER

Mabuchi, Anne

From: Unzueta, Irma
Sent: Monday, November 29, 2004 11:01 AM
To: Mabuchi, Anne
Subject: FW: Draft EIR for Cottage Hospital

DISTRIBUTED TO: **DATE:** 11/29/04
PLANNING COMMISSION (7)
JAN HUBBELL, SR. PLANNER
SCOTT VINCENT, ASST. CITY ATTY.
CASE PLANNER APPLICANT(S) AGENT
PC SECRETARY

Anne,

Please distribute

Thanks,
Irma

-----Original Message-----

From: Sherry Lafler [mailto:slafler@sbch.org]
Sent: Wednesday, November 24, 2004 5:05 PM
To: Unzueta, Irma
Subject: Draft EIR for Cottage Hospital

Dear Ms. Unzueta----I am an employee at Cottage Hospital and am writing concerning the Draft EIR for our new facility, particularly with regard to the issues of increased volume and the proposal to reduce the hours of construction.

Because we are currently the sole provider for acute inpatient care in this community, all those patients come to our facility. That volume will vary, and perhaps increase, in the future but those changes are unaffected by the presence of a new facility. We will have to accommodate that patient load and the associated traffic and parking in any case. We also provide many outpatient services, but that volume is determined by physician referral. There will be traffic generated by community illness and health issues whether we have a new facility or not. It is difficult to see how a new hospital could have any affect on the natural instance of community health problems.

J-1

The Draft EIR also proposes a reduction in the construction hours. I have a concern about the affect this would have in prolonging the construction process. The building of the hospital will take a given number of hours, whether it is spread over two years or four. There is an advantage to everyone to get this project completed as quickly as possible. Not only does a delay affect compliance with the State requirement, it prolongs the disruption for our neighbors. A failure to meet the State mandate because construction hours have been limited does not benefit the community.

J-2

Thank you for taking note of my concerns.

Sharon Lafler

J. RESPONSES TO COMMENTS FROM SHERRY LAFLE

- J-1 **Traffic Effects.** The EIR analysis concludes that the hospital's proposed project would generate additional traffic beyond what the hospital currently generates, resulting in significant traffic impacts. Please refer to Topical Response 1 regarding Trip Generation for additional details regarding traffic trips associated with the project.

The EIR analysis has considered the SBCH's historical growth rate and future projections of inpatient and outpatients when identifying traffic effects. The data in the EIR supports a reasonable worst-case evaluation of how the future hospital expansion will result in more traffic trips generated in the future.

- J-2 **Construction Hours and Duration.** Please refer to Topical Response 3 regarding Construction Hours. The commentator's opinion will be forwarded for decision-maker consideration. The decision-makers will be charged with balancing between prolonged daily and weekend noise impacts to hospital patients and neighbors to meet State timelines vs. a longer overall construction period to provide daily relief to nearby uses. No change to the EIR is required.

K. COMMENTS FROM VIRGINIA ROBINSON

DISTRIBUTED TO: DATE: 12/2/04
PLANNING COMMISSION (7)
JAN HUBBELL, SR. PLANNER
SCOTT VINCENT, ASST. CITY ATTY.
CASE PLANNER APPLICANT(S) AGENT
PC SECRETARY

MEMORANDUM

To: Planning Commission
From: Virginia Robinson
Re: Cottage Hospital
Date: November 29, 2004

As a former planning commissioner, I am particularly interested in the Cottage Hospital planning process.

So far I have been favorably impressed with their commitment to the incorporation of the 'green' design elements to the degree possible. | K-1

There are problems with the draft EIR as I understand it. Neighborhood concerns with construction hours and traffic impacts are familiar and understandable. Most projects in residential areas have been and will be subject to these problems, unfortunately. | K-2

However this is a very special and needed project. As such I hope that the Commission will take into consideration that mandated retrofitting severely limits their alternatives as a not-for-profit institution. | K-3

Santa Barbara County needs a Cottage Hospital that will answer the increasing needs of our ever growing population, and the Hospital needs concerted efforts to expedite the project.



1112 Calle de Los Amigos
Santa Barbara 93105
687-0414

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DEC 9 2004

CITY OF SANTA BARBARA
PLANNING DIVISION

K. RESPONSES TO COMMENTS FROM VIRGINIA ROBINSON

- K-1 **Green Building Design.** Please see Topical Response 4 regarding energy conservation and “green” building design. The commentator’s opinion regarding the incorporation of “green” design elements into the project will be forwarded for decision-makers’ consideration. No change to the EIR is required.
- K-2 **Neighborhood Noise and Traffic Effects.** Please see Topical Response 3 regarding construction hours and Topical Response 1 regarding traffic trip generation. The comment does not identify what problems are perceived with the EIR. The opinion of the commentator that projects in residential areas will be subject to traffic impacts and construction hours will be forwarded for consideration by the decision-makers. No change to the EIR is required.
- K-3 **Mandated Retrofit.** The opinions of the commentator regarding limited options for the hospital to retrofit and the community need for the project and need to expedite the project will be forwarded for consideration by the decision-makers. No change to the EIR is required.

L. COMMENTS FROM DAVID VERNON THOMAS

To: FX 568-2000

ONE PAGE

David Vernon Thomas
 1410 West Valerio Street
 Santa Barbara
 California 93101-4955
 Phone and Fax 805.898.9116
dvthomas1@cox.net

DISTRIBUTED TO: DATE: 12/1/04
 PLANNING COMMISSION (7)
 JAN HUBBELL, SR. PLANNER
 SCOTT VINCENT, ASST. CITY ATTY.
 CASE PLANNER APPLICANT(S) AGENT
 PC SECRETARY

November 30, 2004

City of Santa Barbara Planning Commission

**Environmental Impact Report on
 Cottage Hospital Replacement**

I learn with distress and dismay that your report places impossible demands and burdens on the Hospital's ability to achieve its goals, and I write to beg you to reconsider several unreasonable conditions which your first draft report puts forward.

Above all, please remember that this is Santa Barbara's only hospital and that it is as fine as any in the country. Help it to move forward in every way you can – do not hinder it with theoretical strictures.

L-1

It is a precious asset to us all and should not be treated as would be a commercial venture.

Reasonable construction noise should be tolerated. The vast majority of properties near the Hospital are no longer residential. Citizens who do live nearby should be grateful that a better hospital is being built conveniently near to them.

L-2

Similarly tolerable consideration should be given to the traffic matter.

L-3

Thirdly, applying full and strict enforcement of LEED Certification is an unrealistic burden in the complicated case of a hospital.

L-4

Sincerely yours

David Vernon Thomas

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NOV 30 2004

Copy to Santa Barbara City Council

FX 564-5465

CITY OF SANTA BARBARA
PLANNING DIVISION

L. RESPONSES TO COMMENTS FROM DAVID VERNON THOMAS

- L-1 **Timeline and Conditions.** The opinion of the commentator regarding the conditions placed on the SBCH for development of the proposed project and importance of moving ahead will be forwarded for consideration by the decision-makers. No change to the EIR is required.
- L-2 **Construction Noise.** The opinion of the commentator that construction noise should be tolerated by the neighborhood will be forwarded for consideration by the decision-makers. Also, please refer to Topical Response 3 regarding noise and construction hours. No change to the EIR is required.
- L-3 **Traffic Effects.** The opinion of the commentator that construction traffic should be tolerated by the neighborhood will be forwarded for consideration by the decision-makers. No change to the EIR is required.
- L-4 **Energy Conservation and Green Building.** The opinion of the commentator that LEED certification should not be imposed on the proposed project will be forwarded for consideration by the decision-makers. Please refer to Topical Response 4 regarding energy conservation and “green” building design. No change to the EIR is required.

M. COMMENTS FROM SUSAN SHIELDS

DISTRIBUTED TO: DATE: 12/2/04
PLANNING COMMISSION (7)
JAN HUBBELL, SR. PLANNER
SCOTT VINCENT, ASST. CITY ATTY.
CASE PLANNER APPLICANT(S) AGENT
PC SECRETARY

3033 Calle Rosales
Santa Barbara, CA 93105

11.30.04

Planning Commission
City of Santa Barbara
De la Guerra Plaza
Santa Barbara, CA 93101

In re : Rebuilding of Cottage Hospital

I am concerned that the EIR relating to the reconstruction of Cottage Hospital is unrealistic. As a city resident and a potential client of the hospital, my main concern is that this project be completed as quickly as possible. The disruption in the area caused by construction will be considerable in any case, and therefore there should be no limitations on the hours of work. Restricting the hours would also add considerably to the cost. Furthermore, extending the time required for the project means that it will not be completed within the state-mandated time frame, thus risking penalties under state law.

M-1

There is no reason to assume that the rebuilding of the hospital will result in increased volume of patients and traffic. Unless the local population suddenly increases, the number of patients served will remain the same.

M-2

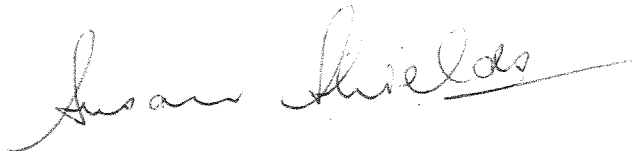
Although the goal of environmentally friendly design is important, it cannot be allowed to add so much to the cost of the building that it jeopardizes an already stretched budget. Cottage Hospital is a non-profit entity and cannot raise the same funds as a business venture. Therefore it is unreasonable to make the same demands for "green" standards.

M-3

The goal of a community hospital is to serve the health needs of the local people. As a potential patient, I want to be assured of medical services in the future, and I do not expect those services to be short-changed or postponed because of construction restrictions or environmental regulations. This project should be allowed to proceed as quickly as possible at reasonable cost. Any increases in time and costs will negatively affect all of us, and the City of Santa Barbara should do what it can to prevent this from happening.

M-4

Yours truly,



Mrs. Susan Shields

Copy to: Mayor and City Council

RECEIVED

DEC 02 2004

CITY OF SANTA BARBARA
PLANNING DIVISION

M. RESPONSES TO COMMENTS FROM SUSAN SHIELDS

- M-1 **Construction Hours.** The opinion of the commentator regarding restrictions on construction hours extending the duration of construction and risking not meeting the State deadline will be forwarded for consideration by the decision-makers. Please refer also to the Topical Response 3 on noise and construction hours. No change to the EIR is required in response to this comment.
- M-2 **Traffic Analysis.** The commentator's opinion is noted. Please refer to Topical Response 1, Traffic Trip Generation, and in the Project Description chapter of the DEIR, the discussion of "Existing and Proposed Patient Volumes and Services." The new hospital will have fewer patient rooms; however, the reduction in rooms is not representative of patient occupancy. There are currently multiple beds per room at SBCH. However, the existing number of beds cannot be utilized due to limitations in genders, types of treatment, and the need for patient isolation. Currently, the bed occupancy rate is approximately 52 percent and it is projected to be 70 percent with the implementation of the proposed project. In addition to inpatients, the hospital proposes to utilize the expanded facility to increase outpatient services into the future. The EIR analysis concludes that the project will result in additional traffic trips.
- M-3 **Green Building Design and Costs.** Please refer to Topical Response 4 on energy conservation and "green" building design. The opinion of the commentator that this nonprofit facility should not be subject to the same standards for "green" building design will be forwarded for decision-makers' consideration. No change to the EIR is required.
- M-4 **Time and Cost.** The opinion of the commentator regarding construction restrictions and limitations on environmental regulations in order to allow the project to proceed promptly through the application and approval process will be forwarded for consideration by the decision-makers. No change to the EIR is required..

N. COMMENTS FROM DONNA PARKER/NICHOLAS VINCENT

Mabuchi, Anne

From: Donna L. Parker [dparker@sbch.org]
Sent: Tuesday, November 30, 2004 3:29 PM
To: argonic35@cox.net; Mabuchi, Anne
Subject: DEIR Santa Barbara Cottage Hospital

DISTRIBUTED TO: DATE: 12/1/04
PLANNING COMMISSION (7)
JAN HUBBELL, SR. PLANNER
SCOTT VINCENT, ASST. CITY ATTY.
CASE PLANNER/APPLICANT(S) AGENT
PC SECRETARY

Ms. Mabuchi:

Please distribute the below correspondence from Dr. Vincent to the Planning Commission.

Thank You!

>>> "nicholas vincent" <argonic35@cox.net> 11/30 3:21 PM >>>
To: City Planning Commission
----- Original Message -----
From: nicholas vincent
To: iunzueta@SantaBarbara.CA.gov
Cc: Ron Biscaro ; argonic35@cox.net
Sent: Tuesday, November 30, 2004 10:32 AM
Subject: DEIR Santa Barbara Cottage Hospital

To: City Planning Commission

From: Nicholas J. Vincent, Treasurer of Cottage Health System Board

Re: Santa Barbara Cottage Hospital DEIR

As a Board member I find it difficult to understand the impediments to comply with this state mandated essential project.

The height restriction, which is considerably lower than our present buildings, will cause the expenditure of an additional \$45,000,000. | N-1

Flood control, which has been a potential city problem for years, now has to be born by the hospital project at a cost of \$7,000,000. Time is of the essence with the project now estimated to be \$50,000,000 more than the original estimate. These and other inflators lead to a total increase of OVER \$75,000,000 for a projected \$425,000,000. before the DEIR is presented! | N-2

If Cottage Health System were not undertaking this project the city and county of Santa Barbara would have to subsidize the project from community funds. I suggest that an attitude of cooperation and even assistance on the part of the city's representatives is necessary if this project is to be completed in a timely manner or indeed at all. Every month of delay costs the project nearly a million dollars. Some of the items in the EIR report could delay the project for years. | N-3

We do not have the resources to reconstruct freeway ramps. The new hospital will have fewer patient rooms than the present. It seems evident that fewer patient rooms should mitigate the numbers of traffic trips. | N-4

The restrictions on construction hours would doom the timely completion mandated by the state. After all this is not just another building or project but an essential community resource. Please take the best interest the community's health care into consideration and move the project to a timely and reasonable approval. | N-5

Thank you.

Nicholas J. Vincent, M.D.

Treasurer of the Board

Cottage Health System

N. RESPONSES TO COMMENTS FROM DONNA PARKER/ NICHOLAS VINCENT

- N-1 **Height Limit.** The commentator's opinion regarding height limits is noted and will be forwarded to decision-makers. This comment is outside the scope of the EIR environmental impact analysis, and no change to the EIR is required. The height limit for the C-O zone (which is the current zoning for the project site) is 45 feet. The project proposes a Specific Plan that would change the height limit to 60 feet for the main hospital buildings (Land Use Area A), which is also the maximum height allowed per the City's Charter. Building heights above 60 feet within the City are considered non-conforming, and new structures would not be allowed based on the current Zoning Ordinance. An amendment to the City Charter to change the maximum building height of 60 feet, would have been required in order to allow the hospital to construct in excess of 60 feet. Therefore, the proposed new hospital structures, within Land Use Area A, are utilizing the maximum allowed heights permitted in the City.
- N-2 **Flooding.** The hospital is located in an area that is prone to flooding. The EIR analysis shows that the proposed closure of Castillo Street as part of the project will worsen the flooding impacts to this area. The hospital project has to address only that portion of the flooding that is caused by the project and the analysis shows that it would. The commentator's opinions regarding the cost of the flood control improvements and the importance of timelines are noted and will be forwarded to decision-makers as part of the Final EIR. No change to the EIR is required.
- N-3 **Time and Cost.** The comments regarding completing the project in a timely manner to avoid additional costs will be forwarded to the decision-makers for their consideration. No change to the EIR is required.
- N-4 **Traffic Effects and Mitigation.** The new hospital will have fewer patient rooms; however, the reduction in rooms is not representative of patient occupancy. There are currently multiple beds per room at SBCH. However, the existing number of beds cannot always be utilized efficiently due to limitations in genders, types of treatment, and the need for patient isolation. Currently, the bed occupancy rate is approximately 52 percent, and it is projected to be 70 percent with the implementation of the proposed project. Once these factors, including an increase outpatient services, are taken into consideration, additional trip impacts will result. Also, please refer to Topical Response 1 on Trip Generation and Response to Comment H-2 regarding traffic impacts associated with the hospital's proposed project.
- N-5 **Construction Hours.** Please refer to Topical Response 3 on noise and construction hours. The comments regarding construction hours, the hospital being an essential community resource, and moving the project in a timely manner will be forwarded to the decision-makers for their consideration. No change to the EIR is required.

O. COMMENTS FROM DAVID VERNON THOMAS, MD, FACP, FRCA

David Vernon Thomas MD FACP FRCA
1410 West Valerio Street
Santa Barbara
California 93101-4955
Phone and Fax 805-898-9116
dvthomas1@cox.net

December 2, 2004

Planning Commission
City of Santa Barbara

I am a former medical school professor.

I have worked in three major university hospitals, namely, Massachusetts General in Boston which is the main teaching hospital of Harvard Medical School, the University of Rochester Hospital in New York, and Stanford University Hospital.

I have worked too in several British hospitals and I have visited many hospitals in Latin America, Europe, New Zealand and Australia.

I assure you that for a city of this size, you have in Cottage Hospital the finest hospital in the world ! Indeed, few cities double or triple this size, have anything to compare with it.

o-1

Please don't cripple its progress, even its survival, by imposing unrealistic, idealistic and unnecessary demands upon its valiant effort to up-grade.

When you contemplate insisting on detailed compliance, think of what the French philosopher Voltaire said:

"The perfect is the enemy of the good".

Thank you,

DV Thomas

O. RESPONSES TO COMMENTS FROM DAVID VERNON THOMAS, MD, FACP, FRCA

- O-1 **Hospital Excellence/Project Requirements.** The comment does not address the potential environmental impacts of the proposed project or the information or analysis contained in the Draft EIR. The commentator's opinions will be forwarded for consideration by the decision-makers. No change to the EIR is required.

P. COMMENTS FROM JOANNE RAPP

Mabuchi, Anne

From: Unzueta, Irma
Sent: Thursday, December 02, 2004 11:04 AM
To: Mabuchi, Anne
Subject: FW: December 2nd EIR hearing for Cottage Hospital

DISTRIBUTED TO: DATE: 12/2/04
PLANNING COMMISSION (7)
JAN HUBBELL, SR. PLANNER
SCOTT VINCENT, ASST. CITY ATTY.
CASE PLANNER APPLICANT(S) AGENT
PC SECRETARY

From: Joannerapp@aol.com [mailto:Joannerapp@aol.com]
Sent: Thursday, December 02, 2004 10:54 AM
To: IUnzueta@SantaBarbaraCA.gov
Subject: December 2nd EIR hearing for Cottage Hospital

Dear Ms. Unzueta,

I regret that I'll not be able to attend the hearing today for Cottage Hospital; however, as a current Board Member of Cottage Health Systems, I would like to add my two cents worth.

While I appreciate the neighborhood concerns around the construction generally and the schedule specifically, the hospital is in a bind time-wise because of the UNFUNDED mandate to make our hospital earthquake safe by a certain date. Rather than trying to only retrofit, the hospital has decided to raise money from the community and other sources to create a new, state of the art hospital to serve the south coast as the only major healthcare provider. It is our hope to complete this construction as quickly, as sensitively and as expeditiously as possible according to the proposed schedule. Extended construction time will be harder on the neighbors and more expensive for the hospital. Hopefully the Planning Commission and Staff will agree that this is the case and will act accordingly.

P-1

I did want to point out that the number of beds is decreasing from the present hospital by 119, albeit bigger rooms with more medical capacity, so the impact should not be interpreted as being more because of a new hospital.

P-2

The Board of Directors is committed to provide as "green" a hospital as is possible in the realm of hospital construction. I'm sure you are aware of the many unique requirements for hospitals that do not affect other construction.

P-3

Lastly, I would like to thank you all, both volunteers and staff, for your time, care, concern and input on this crucially important project. If any of you is of a "certain" age, I'm sure you'll be pleased to have a continuing, state of the art, teaching, first-rate hospital to visit when necessary (cross fingers).

P-4

Sincerely yours,

Joanne Rapp
 Secretary, Board of Directors
 Cottage Health Systems

12/2/2004

P. RESPONSES TO COMMENTS FROM JOANNE RAPP

- P-1 **Project Deadline/Construction Duration.** The comments regarding project mandate, deadline, and construction schedule are noted and will be forwarded to the decision-makers for their consideration. Please refer to Topical Response 3 regarding construction hours. No change to the EIR is required in response to this comment.
- P-2 **Traffic Analysis.** Please refer to Topical Response 1 regarding trip generation associated with the proposed hospital project. The proposed project would have approximately 337 licensed beds, which is 119 fewer beds than the 456 beds currently licensed. It is not the number of beds that dictate the potential impacts, but the overall uses and services of the facility. The beds could have a higher occupancy rate due to single rooms, and the hospital proposes to expand outpatient services, which the additional hospital area would accommodate. Using reasonable worst-case assumptions the EIR analysis concludes that the hospital's proposal would result in several potentially significant environmental impacts. Pursuant to the California Environmental Quality Act (CEQA), potentially significant impacts must be mitigated to the maximum extent feasible.
- P-3 **Green Building.** Please refer to Topical Response 4 on "green" building design. The commentator's opinion is noted that the hospital is committed to provide as "green" a hospital as possible. The comment will be forwarded for consideration by the decision-makers. No change to the EIR is required.
- P-4 **Support for Project.** The comment is noted and will be forwarded to decision-makers.

Q. COMMENTS FROM GROVER BARNES

9658151
12-3-04

Project Planner City of Santa Barbara

RECEIVED

Box 1990 - Santa Barbara, Ca. 93102

DEC 06 2004

Attn. Ms. Irma Martinez

CITY OF SANTA BARBARA
PLANNING DIVISION

Per one,

Sorry to have left before the meeting began (12-2-04)
Briefly, I wish to state my concurrence to your projected
Bldg. plans.

Noise abatement, in order to please proper Owners
with Transquility, & Improvements to meet Ins. Bldg.
Code, and provisions for comfort of the ill, and the
care for the huge expectation of new patients in the
near future.

Home Owners adjacent to the construction operation
have alternate choices, i.e. "Adjust to the Temporary
noise, or S-e-t-b-k!"

In my unbiased opinion, nothing should obstruct
progress, while making readiness for caring for the
ill, disable, & etc, while preparing to preserve those in
good health presently.

Do not impede progressive efforts of doing
something for posterity.

Sincerely,
Harvey D. Barker

Q-1

Q. RESPONSES TO COMMENTS FROM GROVER BARNES

- Q-1 **Construction Noise and Importance of Project and Timely Schedule.** Please refer to Topical Response 3 regarding noise and construction hours. The opinion of the commentator regarding the importance of the hospital and that neighbors should adjust to the construction will be forwarded for consideration by the decision-makers. No change to the EIR is required.

R. COMMENTS FROM JAMES WILSON

James Wilson
329 Arden Road
Santa Barbara, California 93105

December 4, 2004

Members of the Planning Commission
C/O Ms. Irma Unzueta
Project Planner
City Planning Division
PO Box 1990
Santa Barbara, CA 93102

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DEC 07 2004
CITY OF SANTA BARBARA
PLANNING DIVISION

Reference: Draft EIR, Cottage Hospital

Dear Members:

There are several items in the Draft Environmental Impact Report upon which I would like to comment:

Construction Hours—We all will pay some cost to have a hospital which meets State seismic requirements; it is regrettable that some will be exposed to sounds and traffic which will be out of the ordinary over the work day. It is not rational, however, place limits on construction hours which will increase costs beyond what Cottage Hospital manage and to delay completion beyond the State mandated deadline.

R-1

Traffic—It is important to remember that the Hospital is not expanding to accommodate an increased patient load; the larger "footprint" is to accommodate the city's desire for lower building height. Additional traffic, if any, will be as a result of needed services and will happen regardless of whether or not the hospital is rebuilt.

R-2

Leadership in Energy and Environmental Design—While this is a laudable concept LEED has not yet developed standards for hospital design and it appears that there is conflict between state standards for hospitals and many LEED concepts. We cannot let this project get bogged down in bureaucratic resolution of issues of this sort; neither the budget nor the required timeline will allow it.

R-3

Let us make rational decisions and get on with the program.

Very truly yours,



cc: J. O'Neill, Cottage Hospital

R. RESPONSES TO COMMENTS FROM JAMES WILSON

- R-1 **Construction Hours.** Please refer to Topical Response 3 on noise and construction hours. The opinion of the commentator regarding restrictions on construction hours delaying the completion of the hospital beyond the State-mandated deadline will be forwarded for consideration by the decision-makers. No change to the EIR is required
- R-2 **Traffic Impacts.** Please refer to Topical Response 1, Trip Generation, and Response to Comment J-1.
- R-3 **Energy and Environmental Design.** Please refer to Topical Response 4 on “green” building design. The commentator’s opinion regarding conflict between hospital and green building standards and delay and cost issues will be forwarded for decision-maker consideration. No change to the EIR is required.

S. COMMENTS FROM DONALD L. BLACKWILL

Unzueta, Irma

From: D L BLACKWILL [dblackwi@cox.net]
Sent: Saturday, December 04, 2004 10:00 AM
To: Unzueta, Irma
Subject: Cottage Hospital Expansion

Hi,

This e-mail is in response to comments made at the Planning Commission meeting of 12/2/04.

I work within the confines of Cottage Hospital and would certainly agree that an increase in square footage is needed.

I also live close enough to the hospital that I often walk to work.

1) The heliport is just a bad idea if Cottage is to remain at its current location. The noise impacts would be HUGE. I worked next to CMH in Ventura for many years and can assure you that those choppers are very noisy and disruptive. I think it could be argued that they would be a public nuisance for a great distance beyond the immediate Oak Park neighborhood. The heliport should be denied. There is no set of conditions that would adequately mitigate the noise.

S-1

2) The hours of construction should never include weekends and should only deviate from the 8 to 5 schedule very rarely. True, this will drag out the construction time but early morning, night and weekend noise gets pretty old fast. I have lived near construction continuously (honest) for many years now--taking longer is better than constant noise.

S-2

Thanks for your attention,
Donald L. Blackwill

12/6/2004

S. RESPONSES TO COMMENTS FROM DONALD L. BLACKWILL

- S-1 **Helicopter Noise.** Please refer to Topical Response 2 on helipad and helicopter noise issues. The commentator's opinion that the proposed helipad and helicopter operations should be denied and that there are no feasible mitigation measures to reduce the noise levels will be forwarded for consideration by the decision-makers. No change to the EIR is required.
- S-2 **Construction Hours and Noise.** Please refer to Topical Response 3 regarding noise and construction hours. The EIR identifies Mitigation Measure N-9, which would require the project to adhere to the construction hours of 8:00 a.m. to 5:00 p.m., Monday through Friday. Weekend and holiday construction work would not be permitted. Limiting construction to these hours would prolong the construction period approximately 3.5 years. The decision-makers will make the final determination on the feasibility of mitigation measures, taking into account project objectives, cost and time issues, and balancing the daily noise impact vs. the overall construction noise duration. The commentator's opinion that daily and weekend relief is more important than overall duration will be forwarded for consideration by the decision-makers. No change to the EIR is required.

T. COMMENTS FROM JO BLACKWILL

Unzueta, Irma

From: D L BLACKWILL [dblackwi@cox.net]
Sent: Saturday, December 04, 2004 4:46 PM
To: Unzueta, Irma
Subject: cottage Hospital

Hi

We live across from La Cumbre Middle School. I am writing in response to Cottage Hospital Expansion. We have 25 single DU's going up on our street. As a condition of building they are not allowed to work before 8 am and after 5 pm from Monday to Friday and no holdiays. only. This has made this situation bearable. There are many residents in the Cottage area. To have added traffic, loud construction noise and more dirt in the area is terrible. This should be part of limitations on this huge construction sight. Noise pollution and all the stress of all that is involved in a huge construction sight is unbearable and for such a long period of time. There is a sign up in our area that states under no conditions should construction start until 8 am and stop at 5 pm. So it is doable!

Jo Blackwill

T-1

12/6/2004

T. RESPONSES TO COMMENTS FROM JO BLACKWILL

- T-1 **Construction Hours and Noise.** Please refer to Topical Response 3 regarding construction hours and noise. The commentator's opinion supporting limitation of construction to weekdays from 8:00 a.m. to 5:00 p.m. is noted and will be forwarded for decision-maker consideration. No change to the EIR is required.

U. COMMENTS FROM JOHN ACKERMAN, M.D.

Unzueta, Irma

From: JAckerman [j439m@silcom.com]
Sent: Sunday, December 05, 2004 12:13 PM
To: Unzueta, Irma
Subject: Cottage Hospital DEIR

To: Ms. Irma Unzueta, Project Planner
City of Santa Barbara

I am addressing my comments to the DEIR re: Cottage Hospital. Edward McGowan, Ph.D. in International Water Quality presented suggestions to the Planning Commission and the City Council re:

1.) Removal of carpets in the new Cottage addition from all clinical areas in order to help prevent infection; and,

U-1

2.) Gathering up-to-date international information re: protecting the hospital from water and air terrorist attacks.

U-2

Dr. Mc Gowan has done considerable research re: both topics. However, nothing is mentioned in the DEIR. These issues should be addressed in the final DEIR.

U-3

Sincerely concerned,

John M. Ackerman, M.D.

U. RESPONSES TO COMMENTS FROM JOHN ACKERMAN, M.D.

- U-1 **Carpets.** No epidemiological studies have demonstrated that carpeting is a source of microorganisms infecting patients. While organisms, which can cause infection, can be found in carpeting, no evidence has been found suggesting that they are a source (Roger et al. 1982; Skoutelis et al. 1994). Since carpeting would not be present in patients' rooms and hospital hallways, it would not present any risk to the patients.
- U-2 **Water and Air Terrorist Attacks.** The commentator requests the most up-to-date information about protecting the hospital from water and air terrorist attacks. The Emergency Management Manual of Santa Barbara Cottage Hospital is designed to manage the consequences of natural disasters and other emergency situations, such as bioterrorism, that could disrupt the hospital's ability to provide care and treatment (see EIR section 9.4.1 on Page 9-10). The Emergency Management Manual identifies specific procedures to mitigate, prepare for, respond to, and recover from emergencies.
- Please also refer to Topical Response 5 regarding microbial hazards.
- U-3 **Inclusion in EIR.** Please refer to Responses to Comments U-1 and U-2.

V. COMMENTS FROM DONALD M. MCINTYRE

DONALD M. McINTYRE

REFERENCE:

POST OFFICE DRAWER 30320
SANTA BARBARA, CALIFORNIA 93130
UNITED STATES OF AMERICA

(805) 687-7651

December 6, 2004

RECEIVED

DEC 06 2004

CITY OF SANTA BARBARA
PLANNING DIVISION

Planning Commission and
Architectural Board of Review
Community Development Department
City of Santa Barbara
630 Garden Street
Santa Barbara, California 93101

Re.: Environmental Impact Reports
(EIR)
Santa Barbara Cottage Hospital
Cottage Health System

Gentlemen:

In regard to the Hearing, on Tuesday, December 2, 2004, at City Hall where the hospital construction project's draft of the Environmental Impact Reports were open for public discussion and comment, the matter of Santa Barbara Cottage Hospital's biological and chemical waste operations should be given additional careful consideration, in order to insure that toxic liquid is not released into the City's sewage system and/or the State tidelands in the Santa Barbara Channel.

The construction of an on-site sewage treatment facility to process chemical and biological hospital waste before the toxic material is released into the City's liquid refuse system is a matter that must be addressed by the Planning Commission.

Once untreated liquid sewage is permitted into the system and the ocean, a danger exists for humans and

V-1

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DEC 05 2004

CITY OF SANTA BARBARA
PLANNING DIVISION

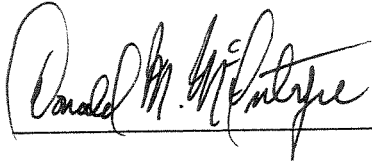
December 6, 2004
Page 2

ocean wildlife. Moreover, it is a proven fact that toxic waste released and/or dumped in the clean free waters of the Channel will cause cancerous growths in aquatic animals and regular fish, which Santa Barbara's fishing industry depends upon for commercial operations, as well as in shell fish that are both eaten locally and exported to the Los Angeles metropolitan area.

Further consideration of this extremely serious matter must be afforded the public before a separate Hearing by the Planning Commission, in order to protect the safety and welfare of the community. This state of the art medical complex should have all the technology available to make it the best and largest hospital between San Francisco and Los Angeles, so that future legal complaints, concerning sewage treatment of medical waste cannot be challenged and/or litigated in Courts of Law against the institution.

Santa Barbara Cottage Hospital must, indeed, be compelled to have the finest modern technology available for its state of the art medical establishment to better serve the South Coast.

Sincerely,

By: 
Donald M. McIntyre

cc.: Ron Werft
Santa Barbara Cottage Hospital
Cottage Health System
Post Office Box 689
Santa Barbara, California 93102

V-1

V. RESPONSES TO COMMENTS FROM DONALD M. MCINTYRE

- V-1 **Sewage Treatment.** Please refer to Topical Response 5 regarding microbial hazards. All wastewater is treated prior to discharge to the Pacific Ocean. Discharges occur one and one-half miles off shore into 80 feet of water. The City is in compliance with all sewage treatment standards and with ocean plan limits for discharge of hazardous, toxic, and carcinogenic compounds to the Ocean. The commentator's opinion regarding the potential for hazards from hospital sewage is noted and will be forwarded for consideration by decision-makers. No change to the EIR is required in response.

W. COMMENTS FROM ARTHUR E. FITZGERALD

December 13, 2004

City of Santa Barbara, Planning Division
P. O. Box 1990
Santa Barbara, CA 93102-1990
Attention: Irma Unzueta, Project Planner

Dear City of Santa Barbara Planning Division members:

The purpose of my letter is to voice support for the construction of a new Santa Barbara Cottage Hospital without arduous and costly delay.

I enthusiastically offer this support from the perspectives of a 33 year resident of the City of Santa Barbara, a 28 year neighbor of Cottage Hospital, a 33 year member of the hospital staff and most importantly, a recipient of the excellent medical care Santa Barbara Cottage Hospital provides.

As a long time resident of Santa Barbara and a near neighbor to Cottage Hospital, I consider living near a state of the art healthcare facility such as Cottage Hospital an asset in my family's quality of life portfolio.

W-1

As a long time staff member of Cottage Hospital I can attest to a philosophy of quality development and a commitment to medical excellence that has existed and continues to thrive at Cottage Hospital. This philosophy of excellence has persisted for many years and exists in the culture of not only the management but in the community as reflected and voiced by local, well informed board members. Additionally, from an internal perspective, I am aware of Herculean efforts by Cottage Hospital management to mitigate construction impacts, address neighborhood issues and spare no effort to develop a comfortable fit within the hospital neighborhood and city of Santa Barbara.

Health care financing and hospital reimbursement specifically are in crisis. Uninsured numbers are increasing exponentially bringing an expanding problem to the financial statements of non-profit hospitals like Cottage. In light of this, I urge you to closely scrutinize any items contained in the Environmental Impact Report that will add significantly to the cost or timely completion of the rebuilding of Cottage Hospital, a true community asset.

W-2

I believe that today, you and I have the rare opportunity to take a mandatory seismic requirement and build the very best state of the art hospital for the citizens of Santa Barbara, surrounding community and visitors, avoiding any additional delay or costs.

Thank you for your consideration of my comments.

Arthur E. Fitzgerald
2116 Chapala Street
Santa Barbara, Ca. 93105

RECEIVED

DEC 15 2004

**CITY OF SANTA BARBARA
PLANNING DIVISION**

W. RESPONSES TO COMMENTS FROM ARTHUR E. FITZGERALD

- W-1 **Support for Project.** The comments in support of the proposed project will be forwarded for consideration by the decision-makers. No change to the EIR is required in response.
- W-2 **Cost and Time.** The comments regarding costs and delays associated with EIR requirements are noted and will be forwarded to the decision-makers. No change to the EIR is required in response.

X. COMMENTS FROM JAMES SCHWAN SR.

James Schwan Sr.
1145 Crestline Dr.
Santa Barbara, CA 93101

Ima

December 13, 2004

The City of Santa Barbara
Planning Commission
630 Garden St.
Santa Barbara, CA 93101

Regarding: Knapp parking Garage

- | | |
|---|-----|
| 1. We are the owners of 2403 De La Vina which is a unit apartment complex. | |
| 2. The working hours should be 8:00 am to 4:30 pm and no weekends or holidays, at least on the parking garage. | |
| 3. The extra hours that the hospital is requesting will cost them more money at time and a half overtime. | X-1 |
| 4. We feel if we lose tenants because of the construction, the hospital and city should make-up and pay our lost rent. This is our retirement income. | X-2 |
| 5. Also there should not be any construction parking or storage of materials in the alley behind the rehab building. | X-3 |
| 6. Rehab has 40 plus spaces in the Knapp existing lot where they park 120 cars per day, three deep. The hospital should increase this number in the new garage. | X-4 |

RECEIVED

DEC 15 2004

CITY OF SANTA BARBARA
PLANNING DIVISION

James A. Schwan Sr.
1145 Crestline Drive
Santa Barbara, CA 93105

CC: Planning Commission
Attn: Bill Mahon
630 Garden St.
Santa Barbara, CA 93101

Rehabilitation Institute
2405 De La Vina St.
Santa Barbara, CA 93105

Cottage Hospital
Attn: Susanne Elledge
320 West Pueblo St.
Santa Barbara, CA 93105

Brian Cearnel AIA
521 1/2 State St.
Santa Barbara, CA 93101

SUGGESTIONS

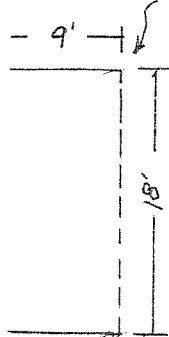
1. Drainage for alley to be addressed
2. Working hours 8:00 am to 4:30 pm, Weekdays, no weekends or Holidays
3. No storage of building materials in alley Or Construction Parking
4. Parking garage should have in & out to Bath St.
5. The drawing below will provide 33 new Parking spaces to be Public Parking

X-5

X-6

SCALE
1" = 30'

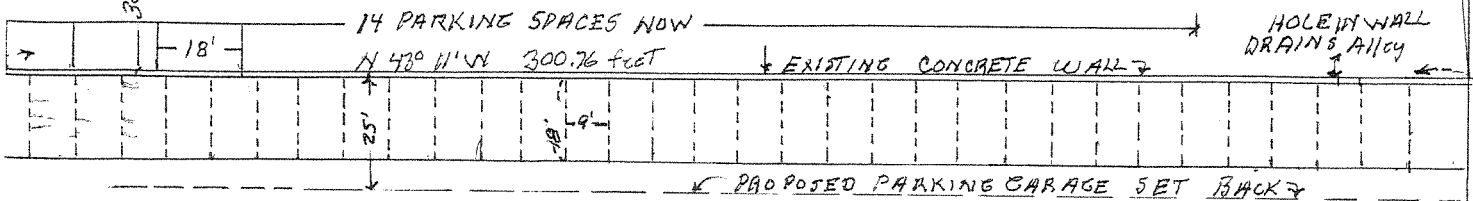
TYPICAL NEW PARKING.
- 9' - } FOR PUBLIC
PARKING -



A.P. 25-061-16

2403 DE LA VINA
A.P. 25-061-14

PUBLIC ALLEY

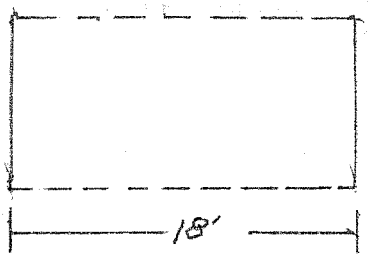


James A. Schwan Sr.
 1145 Crestline Drive
 Santa Barbara, CA 93105

CC: Planning Comm
 Attn: Bill Mahn
 630 Garden St
 Santa Barbara,

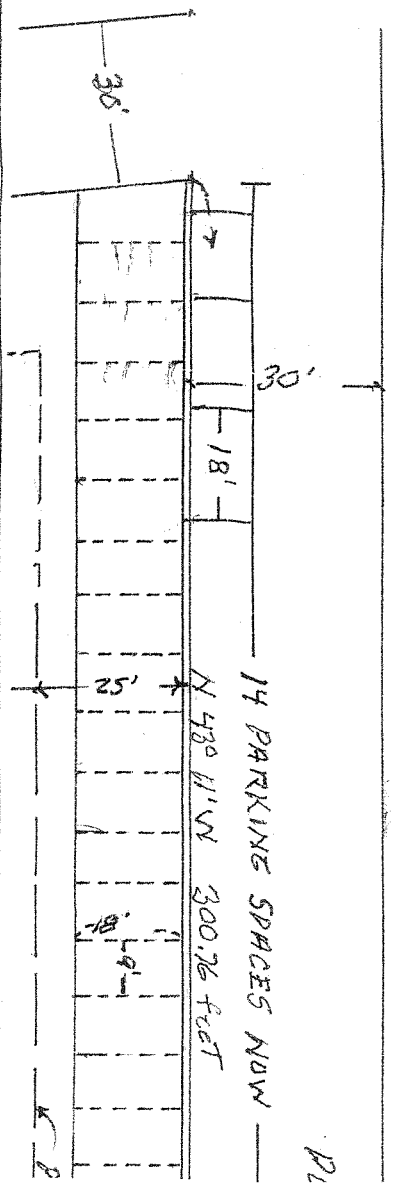
SCALE
 1" = 30'

TYPICAL NEW PARKING.
 9' - 18' FOR PUBLIC
 PARKING -



A.P. 25-064

Rehabilitation
 2405 De La V
 Santa Barbara
 Cottage Hospi
 Attn: Susanne
 320 West Pue
 Santa Barbara
 Brian Ceanel
 521 1/2 State S
 Santa Barbara



X. RESPONSES TO COMMENTS FROM JAMES SCHWAN SR.

- X-1 **Construction Hours.** Please refer to Topical Response 3 regarding construction hours and noise. The commentator's opinions regarding limiting construction hours are noted and will be forwarded to the decision-makers for their consideration. No change to the EIR is required.
- X-2 **Construction Effects on Loss of Tenants/Compensation for Lost Rent.** This socioeconomic concern is outside the scope of the EIR analysis of environmental impacts; however, the comment is noted and will be forwarded for consideration by decision-makers.
- X-3 **Construction Staging, Storage, Parking.** The project will not be permitted to locate staging, storage or parking areas in the alley behind the Rehabilitation Institute. All construction parking, staging of materials, equipment, and machinery will take place on SBCH property or an off-site parking location that is approved by the City. The staging plan and off-site parking facilities will be approved prior to building permit issuance. A shuttle service for construction workers during all construction phases of the project is proposed. Therefore, all construction workers, except for construction project manager staff and subcontractor staff, would park off site and be shuttled to the project site from an off-site parking location.
- X-4 **Parking for Rehabilitation Institute.** As proposed, the Knapp parking structure is intended to accommodate physicians and employees of the hospital, as well as the Eye Center. As required by an existing parking agreement, the hospital would dedicate 44 of the new spaces in this structure to the Rehabilitation Institute. There is no current proposal to increase parking for the Rehabilitation Institute as a part of this project, and the EIR does not identify a project parking impact that would provide a basis for such a proposal. Should the planned hospital parking prove to be in excess of actual needs in the future, the hospital could consider providing parking for other uses in the area.
- X-5 **Access to Knapp Parking Structure.** The proposed Knapp parking structure is designed to take its access (ingress and egress) through the public alley off Bath Street.
- X-6 **Parking Spaces.** Comment noted. Unfortunately the comment does not provide sufficient information to be considered. The graphic provided is unclear and out of context with the proposed project site plan, and a specific response cannot be provided. However, it should be noted that SBCH is meeting its parking demand, and additional parking spaces are not needed.

Y. COMMENTS FROM KERRY MARCU

Kerry Marcu
410 West Los Olivos Street
Santa Barbara, CA 93105
805-687-0332

December 14, 2004

Irma Unzueta, City Planner
Planning Commissioners
City of Santa Barbara
by fax: 805-897-1904

RE: COTTAGE HOSPITAL DEIR COMMENTS

Dear Ms. Unzueta and City Planning Commissioners:

I am a resident in the Oak Park neighborhood. My comments are meant to help Cottage Hospital have the finest facility possible for the entire community.

A couple of recent items have come before the planning commission, the abr, and the city council. Whether or not to remove a single tree from a parkway was agonized over in a recent city council meeting. One tree made it to the highest governmental level in Santa Barbara. Removing a couple of older homes and replacing them with a condo type unit one block from the proposed parking structure appeared before the ABR, where the applicant was told to reduce the height of the building to be more in keeping with the scale of its neighbors. Here, we are talking about removing a significant number of mature trees and replacing them with trees that won't mature for 20-60 years and are even asked to consider placing some of the trees outside the neighborhood. Here, it is acceptable to consider 29, 45 and 60 ft. heights as though they won't tower over nearby residences.

Y-1

Our thinking needs to change when the words "significant" and "unavoidable" are used in the same sentence over and over throughout an environmental impact report. With this plan, land use and air quality will continue to deteriorate in the neighborhood, even at Oak Park where children (one of the "at risk" groups mentioned in the report) congregate daily. If it is the intent of the city to keep the neighborhood's current mixed use into the future, the following ideas should be implemented.

Y-2

UTILITIES UNDERGROUND

When I was about 7 years old, I watched my neighbor being carted out of his garage by ambulance. He had either by design or by accident left his car motor running in the garage and had died of carbon monoxide poisoning from the auto exhaust. Terrified, I ran home and asked my mother if that could happen to us. She said no, that the air outside absorbs all the poisons. I said, but what if there are too many cars in the world? She said that couldn't possibly happen. Her attempts to reassure me failed and I continued to cry. I've been accused of seeing ghosts when I say that I have an image of a helicopter snagging a power line as it approaches Cottage Hospital with a patient aboard. But the seven year old child in me sees things pretty clearly, and the possibility of this happening continues to haunt me.

Y-3

Many people come to Santa Barbara just to visit someone at Cottage Hospital. The exit at Pueblo Street or Mission Street and the short journey to Cottage is the only part of Santa Barbara that they will ever see. As such, it is a gateway to Santa Barbara--a gateway that should be beautiful. We have cleaned up lower State Street, and cleaned up near the Milpas/101 intersection, and cleaned

Y-4

up the entrance to the city at 101 and Carrillo. Shouldn't we also take the opportunity to make this area of Santa Barbara as beautiful?

Y-4

The draft EIR downplays the visual changes that will happen to the neighborhood. I don't see how adding 29 ft. tall parking garages that run nearly the length of two separate blocks as well as 45 ft. tall hospital buildings that run the length of two blocks can be considered insignificant.

Remove the possibility of a helicopter accidentally snagging power lines, beautify this area of Santa Barbara and mitigate the visual impacts upon the neighbors by placing underground all the utility lines in the Oak Park neighborhood, not just the ones immediately adjacent to the hospital.

Y-5

PARKING STRUCTURES

The parking structures are too large. Maybe Cottage really does need all the parking spaces they are asking for, and maybe not. I still don't see any shuttle recommendations for Cottage's employee housing in the neighborhood formerly known as St. Francis. Require that Cottage place all or most of the parking underground, below the hospital and the Knapp Building and the child care facility. Recommend that Cottage build employee housing on the surface areas and reduce air quality, traffic and visual impacts in both neighborhoods. Just because a thing is expensive or hard to do doesn't mean it shouldn't be done.

Y-6

Employees park throughout the neighborhood now. In the future they will be asked to park in one of two parking structures, concentrating the noise and pollution down to two pinpoints on the map. Noise levels were measured at the current, much smaller parking structure than either of the ones planned for the area. How can you project future trips and noise levels when the paths of travel change to this extent? There isn't any similarity between normal household interior sounds and anything that occurs in a parking lot, as stated in the DEIR. The assumption of no lighting impacts because there are no openings in the south and west elevations of the Pueblo parking structure as stated in Chapter 14, pag. 23 may be flawed if it is true that Cottage intends to build the parking structure with openings on the south and west elevations on any of the parking levels.

Y-7

Y-8

The parking structure's top floor should be closed to incoming traffic and its top level lights should be dimmed and put on motion sensors between 10:00 p.m. and daylight.

Y-9

BIOLOGICAL RESOURCES

I notice that there are some species left out of the list of birds that inhabit the area, namely owls and kestrels. How can they keep our population of rodents at bay if the mature trees where they nest are removed? Some of the vegetation in the neighborhood is not suited to nesting and roosting for birds. We had a pair of scrub jays nest in our pittosporum tree only to watch their little family be cannibalized by crows. I can't imagine where they and the next generation will go while they wait for small replacement trees to grow if the mature canopy is removed. 20-60 years for oak trees to mature is a very long temporary to our wildlife and to our way of life.

Y-10

Y-11

DEVELOPMENT AGREEMENT/SPECIFIC PLAN

The development agreement Cottage is requesting limits the city to rules and regulations that are in effect now. Who knows what new technology the future may hold? Don't let Cottage limit the City to regulations in place now. Keep the current CO zoning protections of building heights and compatibility with adjacent residential uses. If a specific plan is deemed needed, keep the south elevation setbacks at the current projected 96 feet rather than the 4'11" listed in the draft.

Y-12

NOISE/VIBRATION

There is a recommendation that Cottage conduct a survey of damages and cracks in the neighborhood homes as a mitigation measure before construction begins, but the recommendation doesn't go far enough. Mitigation is what happens after the survey is completed and what measures

Y-13

will be taken if there is construction damage. I would request for nearby homes a damage and crack survey as well as an agreement that Cottage would repair any damage to private property in the area resulting from construction. Replacement of 90+-year-old red oak flooring, wavy window glass and plaster walls will be expensive. But how can homes that were built between 1915-25 not be given consideration as being historically important examples of what the neighborhood used to be?

Y-13

Y-14

MONITORING/REPORTING STAFF

A city staff person should be assigned to oversee the construction project, someone to whom the neighbors can report if we see dangerous conditions and who has the authority to insist that those conditions be changed or to stop construction.

Y-15

CONSTRUCTION HOURS

Cottage Hospital's meetings with the neighborhood and the literature they sent to neighbors stated that their hours of construction would be 8:00 a.m.-5:00 p.m. Monday-Friday. In this DEIR and at the DEIR public comment meeting, Cottage is now requesting additional construction hours, with earlier morning and later evening weekday hours in addition to weekend hours. This poses a problem for residents of the area. We assumed we could believe what Cottage told us at the neighborhood meetings. We are now asked to give up our quiet evening and weekend hours for a period that may last 9 years. We are asked to believe that if Cottage Hospital has not shown that it has made a significant inroads and is continuing to rebuild its facility in good faith, on a particular date in 2013 OSHPD will shut the hospital down. This is farfetched and melodramatic. Since the neighborhood is to be subjected to 9 years of construction, I request that the hours of construction operation be limited to 8:00 a.m.-5:00 p.m. Monday-Friday. Since construction activity begins well before the stated hours of operation while equipment warms up and employees straggle in, I consider that we are already being subjected to more than an eight-hour work day. We would like to be able to open our windows to refresh our homes more than one day a week.

Y-16

TRAFFIC CIRCULATION

The closing of Castillo Street will be a major lose for the neighborhood. Streets don't exist in a vacuum. If there are impacts on one block of Castillo Street or Oak Park Lane, those impacts will change the character of any street that touches it: Padre, Los Olivos, Pueblo, Junipero, and all the other streets in the area, including already trafficbound De la Vina and Chapala.

Y-17

HELIPAD

According to the DEIR, windy conditions could change the expected flight path of helicopters to the landing pad. The touchdown and lift off area within the final approach and take off area should be elevated above the level of any obstacle in the final approach and liftoff area. The height of the helipad is expected to be 60 ft., while the remaining hospital building is 79 ft. significantly higher than the final approach and liftoff area. All helipad operations, whether day or night, should be limited to emergency use only.

Y-18

Please help this area keep its traditional mix of uses so that Cottage Hospital has neighbors who wish to continue living there, not just office buildings that close in the evenings. Thank you for the opportunity to voice our concerns and suggestions.

Sincerely,


(Mrs.) Kerry Marcu

Y. RESPONSES TO COMMENTS FROM KERRY MARCU

- Y-1 **Tree Removal.** The EIR biological impact analysis recognizes that replacement trees would take many years to mature to the sizes of trees to be removed. The commentator's opinions regarding removal of trees and replacement off-site as well as building heights are noted and will be forwarded to the decision-makers for review as part of the Final EIR. Also please refer to Responses to Comments E-3, E-4, G-33, and G-35 regarding tree protection and replacement off-site.
- Y-2 **Deterioration of Land Use.** The comment states that the proposed project will cause deterioration of land use and air quality. The EIR initial policy consistency review concludes that the proposed project the City's and the proposed Specific Plan and SP-8 Zone would be consistent with the applicable goals and policies of the General Plan, the City's Municipal Code, and Charter Section 1508 (ref. EIR, Section 4.7, Summary). The City decision-makers on the project, including the Planning Commission, City Council, and Architectural Board of Review will make final determinations regarding project design, project consistency with City land use policies, and project compatibility with the neighborhood. The commentator's opinions will be forwarded to the decision-makers for their consideration.
- Air Quality Impacts.** The EIR addresses air quality effects from long-term operational and temporary construction activities of the proposed hospital reconstruction, in accordance with the California Environmental Quality Act (CEQA), City, and Santa Barbara County Air Pollution Control District (SBCAPCD) impact significance criteria. The EIR concludes that some, but not all, of the potential air quality impacts would be significant and unavoidable with all feasible mitigation applied.
- Y-3 **Aircraft Safety/Utility Undergrounding.** Please refer to the Aircraft Safety Impacts (Project Long-Term) discussion in the EIR. Helipad and helicopter operations, including maintenance, flight paths, and heights on take-off, approach, and landing would be subject to regulations of the Federal Aviation Administration (FAA) and the California Department of Transportation (Caltrans). Please also refer to Response to Comment Y-5 regarding utility undergrounding. The commentator's opinions will be forwarded for decision-maker consideration.
- Y-4 **Beautification of Area/Utility Undergrounding.** The project will be subject to an extensive City design review process and would provide improvements to architectural and landscape design, road improvements, and utility undergrounding. Please also refer to Response to Comment Y-5 regarding utility undergrounding. The commentator's opinions will be forwarded to the decision-makers for their consideration.
- Y-5 **Underground Utilities in Oak Park Neighborhood.** The commentator's opinion that overhead utilities throughout the Oak Park neighborhood should be undergrounded by the project is noted and will be forwarded for decision-maker consideration. Municipal Code standards provide for the Hospital to underground the seven poles along Castillo Street to

accommodate the abandonment of Castillo. City staff will recommend undergrounding of utility poles around the entire property frontage. The EIR visual impact analysis finds the project-specific visual impact and the project contribution to cumulative visual impacts within the Oak Park community as adverse but less than significant, and no mitigation measures are required. There is no nexus and proportionality between the environmental impacts of the project and the neighborhood-wide mitigation measure suggested by the commentator, and the cost of such a neighborhood-wide measure would also be infeasible. Through the City's extensive project review and design review processes, the decision-makers will consider utility under-grounding as feasible to minimize the project's adverse but less than significant visual impacts and enhance project compatibility consistent with policies and design guidelines. Decision-makers may also consider project benefits in making findings of overriding consideration to deem significant impacts acceptable. The City decision-makers will make final determinations on the extent of utility undergrounding. The commentator's opinions will be forwarded to the decision-makers for their consideration.

Y-6 Parking Structures Too Large. The EIR identifies the project's parking demand to be 1,359 parking spaces. The proposed parking structures would accommodate the majority of these spaces.

Shuttle Service. The suggested shuttle service between Cottage Hospital and the St. Francis site housing project is not part of this project because the two projects are on separated properties and different schedules. There is no surety at this time that the housing project would continue forward, so determinations for the hospital project cannot depend on the housing project. However, a workforce housing project is currently a proposal at the former St. Francis property and includes consideration of a shuttle/vanpool program to transport employees to and from Cottage Hospital and other Cottage Health System work sites. A further reference to this shuttle proposal has been added to the Long-Term Cumulative Traffic Analysis of the Final EIR for the hospital reconstruction project. A separate environmental impact report on the housing project at the St. Francis site will also be circulated for public review to consider

Underground Parking. Placing the parking underground is one of the alternative projects described in Chapter 15.0 of the EIR. This alternative would be subject to more stringent State regulatory structural design constraints, which raises questions about technical feasibility, and it would provide less parking in the long-term compared to the project. Undergrounding the parking would add substantial construction cost and time (an estimated additional 17 months) with greater associated construction-related air quality, noise, geophysical, groundwater, public services, traffic, circulation, parking, and visual effects, including substantial noise and vibration increases associated with subsurface excavation, compared to the proposed project. The EIR identifies this alternative as potentially infeasible for meeting the project objective of completion by the legislative deadline.

The commentator's opinions regarding the parking structures being too large, building employee housing to reduce air quality, traffic and visual impacts to both the Cottage Hospital and St. Francis neighborhoods will be forwarded to the decision-makers.

- Y-7 **Parking Garage Noise.** Noise associated with parking structures was evaluated based on the potential maximum noise level associated with vehicle parking activities, such as slow-moving cars, door slamming, engine start, and acceleration of vehicles. Factors affecting the noise propagation, such as distance attenuation and shielding provided by intervening structures, were also used in the noise impact analysis. Noise measured at the current sites documents the existing noise environment, but was not the only basis for calculating the noise levels and impacts from the proposed parking structures. Noise associated with vehicle travel outside of the parking structures (i.e., trips between the hospital and the origin/destination of the vehicular traffic), was evaluated in the traffic noise impact scenario and was found to be less than significant.
- Y-8 **Pueblo Parking Structure Lighting.** Please refer to Response to Comment G-107 regarding refinements to the Pueblo parking structure lighting impact analysis in response to this comment.
- Y-9 **Pueblo Parking Structure Lighting and Noise.** The comment suggests that the Pueblo parking structure be closed to incoming traffic and top level lights dimmed and put on motion sensors between 10:00 p.m. and daylight. The suggested measures are noted and will be forwarded to the decision-makers for consideration.
- Y-10 **Nesting Birds.** References to owls and kestrels have been added to the EIR biological resources discussion of local wildlife and typical bird species that could potentially inhabit the area. The EIR already identifies the impact of project construction to nesting birds as potentially significant, and mitigation measures are identified to reduce these impacts. The EIR also identifies the project impact from loss of wildlife habitat until replacement vegetation matures.
- Y-11 **Habitat Loss.** Section 6.6.1 of the EIR acknowledges that there would be temporal loss of foraging habitat. As stated in Section 6.6.1, a reconnaissance survey within the general vicinity of the project site and the Oak Park neighborhood indicates that there is adequate mature vegetation within close proximity to the project site to accommodate displaced bird and animal species during this interim period.
- Y-12 **Development Agreement/Specific Plan.** The Development Agreement would ensure that the regulations in place when the project is granted approval would remain through completion of the project. This is necessary since the construction of the project is expected to take at least 9 years, while a Development Plan Approval typically expires after four years. The Development Agreement also ensures that the hospital project is constructed in a timely manner. The current proposal is to establish a Specific Plan (SP-8) for the project area. The SP-8 will become the zoning for the hospital project site and will provide specific development standards and regulations. The Specific Plan provides for minimum 10-foot setbacks for Land Use Area C, which would contain the Pueblo Parking Structure, however, the parking structure is currently proposed to be set back approximately 85 feet to the first above-ground level of the parking garage to the residential property line of the homes on Parkway Drive.

- Y-13 **Crack Survey Mitigation Measure N-8.** Please refer to Responses to Comments G-79 and AA-30 regarding revised wording to Mitigation Measure N-8. Mitigation Measure N-8, which requires the preparation of a crack survey and video reconnaissance, is amended to require compensation to property owners of structures within 150 feet that sustain vibration-caused damage as a result of the hospital project construction.
- Y-14 **Historic Structures.** The structures located on Parkway Drive date back to the early 1900s; however, neither the Historic Resources Studies nor the EIR prepared for the SBCH project identify these homes as significant historic resources based on federal, State, and City historic significance criteria.
- Y-15 **Construction Monitoring.** The project applicant will be required to designate a City-approved Project Environmental Coordinator (PEC), who will be responsible for implementation of all construction conditions of approval, compliance with mitigation measures, and reporting. City inspectors will be responsible to assess whether construction features have been installed correctly and will have oversight over mitigation monitoring. Both the PEC and City staff have the authority to stop construction. Contact information will be available to members of the public for reporting concerns or violations during project construction.
- Y-16 **Construction Hours.** Please refer to Topical Response 3 regarding construction noise and hour limitation. Comments representing the opinions of the commentator will be forwarded to the decision-makers for review as part of the Final EIR.
- Y-17 **Castillo Street Closure.** The closure of Castillo Street is a project feature of the Cottage Hospital project. The EIR recognizes that abandoning a street has circulation impacts on the adjacent street network. Pedestrian, bicycle and vehicle counts were done to quantify the existing pedestrian, vehicular and bicycle trips on the 2300 block of Castillo, and the EIR identifies impacts to traffic and circulation on the surrounding streets. Recommended measures to offset the adverse effects of the permanent closure of Castillo Street between Junipero and Pueblo Streets are explained in detail on pages 13-28 and 13-29 in the EIR. The discussion in the EIR in Chapter 13.0 also recognizes that an increase in the volume of traffic on the adjacent streets can impact livability of the streets in the vicinity. A comparison of existing average daily traffic trips (ADT) and future (with project) ADT is shown on Table 13.I in the EIR. The recommended mitigation as specified on pages 13-28 and 13-29 is anticipated to be effective mitigation for the increase in neighborhood traffic volume on the adjacent streets.
- Y-18 **Helipad Operations.** The remaining hospital building with a building height of 79 feet is not in the approach or departure flight paths for helicopter operations and would not interfere with helicopter operations. The EIR recommends that nighttime helicopter operations be limited to medical emergency only. It would take 10 daytime flights to equal the effect to the average day-night ambient noise level (L_{dn}) generated by one nighttime flight. Daytime helicopter flights would not result in as much annoyance as nighttime flights. The commentator's opinions and suggestion for restricting all non-emergency flights will be forwarded for decision-maker consideration.

Z. COMMENTS FROM ELLIOTT KARPELES

ATTN:

Irma Unzueta

Donna Bayet

(805) 563-2921

p. 1

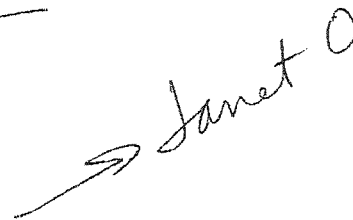
Ron Werft CEO
Santa Barbara Cottage Hospital
November 2, 2004

Sir, Since I will be unable to attend this afternoon's Planning Commission hearing, I have written out a few of my thoughts. You may present them for me or use them as you wish.

Cottage Hospital and its many and varied services are an absolute essential to Santa Barbara and the surrounding area. The State has mandated that all hospitals in California must retrofit or rebuild; and this completed within a set time-frame. I think the last thing that we need, or want, are slow-downs or stumbling-blocks that delay the project and drive up the cost. We all need to be a bit more cooperative and flexible, and work together to complete construction on this invaluable community asset in a timely manner.

Z-1

Thank you,
Elliott Karpeles
682-1877



Z. RESPONSES TO COMMENTS FROM ELLIOTT KARPELES

- Z-1 The comments regarding essential nature of the facility and need for timely process are noted.
The comment will be forwarded to decision-makers for their consideration.